c. Please provide a description of the documentation provided by the generator to demonstrate that closure was completed in accordance with the closure performance standards.

NOTE: If the generator has closed a <90-day tank, closure must also be completed in accordance with OAC 3745-66-97 (except for paragraph C of this rule). [3745-52-34]

**REMARKS** 

O Awating electronic Submitted Via software

# **MANIFEST REQUIREMENTS**

You must start this part of the inspection by telling the company representative about the certification statement on the hazardous waste manifest using the following question and statement:

Are	you aware of what the statement that you sign on the manifest	says? Yes <u></u> No
If the an	swer is no, show them what the statement says using a signed	manifest.
NOTE:	While the statement is a certification that a P2 strategy is does not establish any legal obligations with which the cwords, there is no violation of the hazardous waste rules don't have a program in place.	company must comply. In other
1.	Have all hazardous wastes shipped off-site been accompanied by a manifest? (U.S. EPA Form 8700-22) [3745-52-20(A)]	Yes ✓ No □ N/ARMK#
2.	Have items (1) through (20) of each manifest been completed? [3745-52-20(A)]	Yes No N/ARMK#
NOTE:	U.S. EPA Form 8700-22(A) (the continuation form) may be 22. In these situations items (21) through (35) must also	e needed in addition to Form 8700- be completed. [3745-52-20(A)]
3.	Does each manifest designate at least one permitted disposal facility? [3745-52-20(B)]	Yes <u></u> No □ N/ARMK#
NOTE:	The generator may designate on the manifest one alternative event of an emergency which prevents the delivery of was facility. [3745-52-20(C)].	ate facility to handle the waste in the aste to the primary designated
1.	Since the date of the last inspection, has the transporter been unable to deliver a shipment of hazardous waste to the designated facility? If so:	Yes NoN/ARMK#
	a. Did the generator designate an alternate TSD facility or give the transporter instructions to return the waste? [3745-52-20(D)]	Yes No □ N/ARMK#
5.	Have the manifests been signed by the generator and initial transporter? [3745-52-23(A)(1)(2)]	Yes <u>√</u> No □ N/A <u>·</u> RMK#
5.	Has the generator received a return copy of each completed manifest within 35 days of being accepted by the transporter? If not:	YesNo N/ARMK#
	a. Did the generator contact the transporter and/or TSD facility to check on the status of the waste? [3745-52-42(A)]	Yes No □ N/ARMK#

*	b.	If the manifest was not received within 45 days, did the generator file an exception report with Ohio EPA?	Yes	_ No □	N/A 🗸	
		[3745-52-42(A)(2)]		j.		
7.		signed copies of all manifests and any exception orts being retained for at least three years? [3745-52-	Yes <u>/</u>	No 🗆	N/A	_RMK#

**REMARKS** 

# PERSONNEL TRAINING

1.		es the generator keep records required by 3745-65-D) including:			
	a.	Job titles, as they relate to hazardous waste management, and the name of each employee filling each job?	Yes 📈 No 🗅	N/A	_RMK#
	b.	Job descriptions, including requisite skill, education, or other qualifications, and duties of facility personnel assigned to each position?	Yes <u>√</u> No □	N/A	_RMK#
	C.	Type and amount of both introductory and continuing training to be given to each person filling a position?	Yes 🖊 No 🗅	N/A	_RMK#
	d.	Documentation that personnel have completed the training or job experience required under 3745-65-16(A)(B) & (C)?	Yes ✓ No □	N/A	_RMK#_ <u>(</u>
NOTE:	ab an	the facility's business practices precludes written job to le to identify, by name, all personnel who are involved d the training/experience that they receive initially and n be used to document that all necessary employees h	with hazardous annually. Item	waste m 9 on the	anagement
2.	tead pro- imp	es the generator have a training program which ches facility personnel hazardous waste management cedures (including, but not limited to, contingency plan lementation) relevant to their positions? [3745-65-A)(2)	Yes <u>✓</u> No □	N/A	_RMK#
3.	the able	es the personnel training program include instruction in following areas to ensure that facility personnel are to respond effectively to emergencies by familiarizing m with: [3745-65-16(A)(3)]			·
	a.	Emergency procedures?	Yes No 🗆		
	b.	Emergency equipment?	Yes No 🗆		
	, <b>C</b> .	Emergency systems?	Yes ∠ No □	N/A	_RMK#
4.		es emergency training described in 3(a), (b) and (c) ve include, where applicable: [3745-65-16(A)(3)(a-f)			
	a.	Procedures for using, inspecting, repairing and replacing emergency and monitoring equipment?	Yes <u>✓</u> Ño □	N/A	_RMK#

	b.	Key parameters for a systems?	automatic waste t	feed cut-off	Yes <u></u> M No □	N/A <u>*</u>	RMK#
	C.	Communication or a	arm system?		Yes V No 🗆	N/A <u>·</u>	RMK#
	d.	Response procedure	es for fire/explosion	ons?	Yes <u>✓</u> No □	N/A	RMK#
	e.	Response to ground	water contaminat	tion incidents?	Yes / No 🗆	N/A	RMK#
	f.	Shutdown procedure	s?		Yes No 🗆	N/A 🗸	RMK#
5.	train	ne personnel training p ned in hazardous was 15-65-16(A)(2)]			Yes <u>✓</u> No □	N/A	RMK#
6.	afte	new employees receiver the date of hire (or a left) 15-65-16(B)]	ve training within essignment to a n	six months ew position)?	Yes No <i>i</i> ⊠	N/A	RMK#
7.	Doe emp	s the generator providules the generator providules (3745-65-16)	de annual refresh (C)]	ner training to	Yes <u>✓</u> No □	N/A	RMK#
8.	Are training records for current personnel kept until  closure of the facility? [3745-65-16(E)]				N/A	RMK#	
9.	three	training records for fo e years from the date ity? [3745-65-16(E)]			Yes No 🗆	N/A	RMK#
10.	(writ eme	ional: The following s lved with hazardous v ten and/or on-the-job rgency coordinators, ns, personnel who pre	vaste manageme ) may include the personnel who c	ent have been traine e following: environn onduct hazardous w	ed. The employed nental coordinato	es who nee rs. drum ha	ed training andlers.
	<u>Job</u>	Performed	Name of	Employee		Date(s)Tr	<u>ained</u>
6	Xt	P	Dav	Halimon		der der verlegen der der verlegen der	
0	Sen	e job change	for some	EMARKS  employer- 7  cuning yir a	the pre-ma	he Nead	y team
h	sonit Solv	ifically D. Hu	themen die	men traine	n ·	,	
<u>(a)</u>		an 2 defens	prefam	sups of staff			

RCRA HAZARDOUS WASTE GENERATOR INSPECTION CHECKLIST

# **CONTINGENCY PLAN**

1.	Do- des	es the generator have a contingency plan which scribes the following: [3745-65-52(A) through (F)]			
	a.	Actions to be taken in response to fires, explosions or any unplanned release of hazardous waste?	Yes <u></u> No □	N/A	_RMK#
	b.	Arrangements/agreements with emergency authorities? [3745-65-37]	Yes <u>✓</u> No □	N/A	_RMK#
	C.	A current list of names, addresses and telephone numbers (office and home) of all persons qualified to act as emergency coordinator?	Yes / No 🗅	N/A	_RMK#
	d.	A list of all emergency equipment, including: location, physical description and brief outline of capabilities?	Yes No 🗆	N/A	_RMK#
	e.	An evacuation plan for facility personnel where there is a possibility that evacuation may be necessary?	Yes / No 🗆	N/A	_RMK#
NOTE:	CFI pla	he facility already has a "Spill Prevention, Control and ( R Part 112 or 40 CFR Part 1510, or some other emergen n to incorporate hazardous waste management provision h OAC requirements. [3745-65-52(B)]	cy plan, the fac	ility can	amend that
2.	or t	he plan designed to minimize hazards to human health he environment from fires, explosions or any planned release of hazardous waste? [3745-65-52(A)]	Yes ∠ No □	N/A	_RMK#
3.	bee req	copy of the plan (plus revisions) kept on-site and en given to all emergency authorities that may be uested to provide emergency services? [3745-65-A)(B)]	Yes <u>√</u> No □	N/A	_RMK#
4.	cha	s the generator revised the plan in response to rule inges, facility, equipment and personnel changes, are to the plan or as required by the Director? [3745-54]	Yes <u>√</u> No □	N/A	_RMK#
EMERG	ENC	Y COORDINATOR			
5.		n emergency coordinator available at all times (on-site on-call)? [3745-65-55]	Yes No 🗆	N/A	_RMK#
					e*

NOTE:	cor cha lay	e emergency coordinator shall be thoroughly familiar watingency plan; (b) all operations and activities at the factoristics of waste handled; (d) the location of all recout; and (f) shall have the authority to commit the resources of the contingency plan	ncility; (c) the location and cords within the facility; (e) facility
6.	was	s there been a fire, explosion or release of hazardous ste or hazardous waste constituents since the last pection? If so:	Yes No_/N/ARMK#
,	a.	Was the contingency plan implemented? [3745-65-51(B)]	Yes No □ N/A <u></u> RMK#
	b.	Did the facility follow the emergency procedures in 3745-65-56(A) through (H)?	Yes No □ N/A <u></u> RMK#
	C.	Did the facility submit a report to the Director within 15 days of the incident as required by 3745-65-56(J)?	Yes No □ N/ARMK#

NOTE: OAC 3745-65-51(B) requires that the contingency plan be implemented immediately whenever there is a fire, explosion, or release of hazardous waste or hazardous waste constituents, which could threaten human health and the environment.

**REMARKS** 

#### PREPAREDNESS AND PREVENTION [3745-52-34(A)(4)] 1. Is the facility operated to minimize the possibility of fire, Yes <u></u>No □ N/A \_\_RMK#\_ explosion, or any unplanned release of hazardous waste? [3745-65-31] 2. Does the generator have the following equipment at the facility, if it is required due to actual hazards associated with the waste: [3745-65-32(A)(B)(C)(D)] Yes \_\_\_ No □ N/A \_\_\_RMK#\_\_\_ a. Internal alarm system? Yes / No D N/A \_\_\_RMK#\_\_\_ b. Emergency communication device? Yes <a>✓</a> No <a>□</a> N/A <a>\_\_RMK#<a>\_\_</a> Portable fire control, spill control and decon equipment? Yes ∠ No □ N/A \_\_\_RMK# Water of adequate volume/pressure? 3. Is emergency equipment tested (inspected) as necessary Yes ✓ No □ N/A RMK# to ensure its proper operation in time of emergency? [3745-65-33] Yes ✓ No □ N/A \_\_\_RMK#\_\_\_ 4. Are emergency equipment tests (inspections) recorded in a log or summary: [3745-65-33] 5. Do personnel have immediate access to a communication Yes V No □ N/A RMK# device when handling hazardous waste (unless the device is not required under 3745-65-32)? [3745-65-34] Yes \_\_No D N/A \_\_\_RMK#\_\_\_ 6. Is adequate aisle space provided for unobstructed movement of emergency or spill control equipment? [3745-65-35] Yes No N/A RMK#\_\_ 7. Has the generator attempted to familiarize emergency authorities with possible hazards and facility layout? [3745-65-37(A)] Yes \_\_\_ No □ N/A \_\_\_RMK#\_\_\_ Where authorities have declined to enter into arrangements/agreements, has the generator documented such a refusal? [3745-65-37(B)]

REMARKS

# **GENERATOR ACCUMULATION**

1.	<u>in e</u>	s the generator accumulated hazardous wastes on-site excess of 90 days without a permit or an extension the director? [3745-52-34; ORC §3734.02(E)(F)]	Yes □ No. ✓ N/ARMK#
SATELL	.ITE	ACCUMULATION AREA REQUIREMENTS [3745-52-34(	C)(1)]
2.		es the generator ensure that satellite accumulation a(s):	
	a.	Are at or near a point of generation?	Yes <u>√</u> No □ N/ARMK#
	b.	Are under the control of the operator of the process generating the waste?	Yes ☑ No ☐ N/ARMK#
	C.	Do not exceed a total of 55 gallons of hazardous waste?	Yes_/_No N/ARMK#
	d	Do not exceed one quart of acutely hazardous waste at any one time?	Yes No □ N/A /_RMK#
	e.	Containers are marked with the words "Hazardous Waste" <u>or</u> other words identifying the contents?	Yes ✓ No □ N/ARMK#
NOTE:	acc	e 55 gallon limit applies to the area itself, and not to eac cumulated in the area. The inspector should refer to Oh the Location of Satellite Accumulation Areas.	ch individual waste stream nio EPA's November 1994 Guidance
3.		ne generator accumulating hazardous waste(s) in ess of the amounts listed in either 2(c) or 2(d)? If so:	Yes No/ N/ARMK#
	a.	Did the generator comply with 3745-52-34(A) or other applicable generator requirements within three days?	Yes ∠ No □ N/ARMK#
	b.	Did the generator mark the container(s) holding excess with the accumulation date when the 55 gallon (one quart) limit was exceeded?	Yes No □ N/ARMK#
USE AN	D M	ANAGEMENT OF CONTAINERS	
4.		s the generator marked containers with the words zardous Waste?" [3745-52-34(A)(3)]	Yes No N/A RMK#

5.	Is the accumulation date on each container? [3745-52-34(A)(2)]	YesNo □ N/ARMK#
6.	Are hazardous wastes stored in containers which are:	
	a. Closed (except when adding/removing wastes)? [3745-66-73(A)]	Yes No □ N/ARMK#
	b. In good condition? [3745-66-71]	Yes 🖊 No □ N/ARMK#
	c. Compatible with wastes stored in them? [3745-66-72]	Yes <u>✓</u> No □ N/ARMK#
	d. Handled in a manner which prevents rupture/leakage? [3745-66-73(B)]	Yes ✓ No □ N/ARMK#
7.	Is the container accumulation area(s) inspected weekly? [3745-66-74] (Note location in general information section of checklist)	Yes No N/A RMK#
	a. Are inspections recorded in a log or summary? [3745-66-74]	Yes ✓ No □ N/ARMK#
8.	For ignitable and/or reactive hazardous waste(s):	
	a. Are containers located at least 50 feet (15 meters) from the facility's property line? [3745-66-76]	Yes /_ No 🗆 N/ARMK#
	<ul> <li>Are containers stored separately from other materials which may interact with the waste in a hazardous manner? [3745-66-77(C)]</li> </ul>	Yes <u> </u>
PRE-TR	ANSPORT REQUIREMENTS	
9.	Does the generator package/label its hazardous waste in accordance with the applicable DOT regulations? [3745-	Yes <u>✓</u> No □ N/ARMK#
10.	52-30, -52-31 and -52-32(A)]  Does each container <110 gallons have a completed hazardous waste label? [3745-52-32(B)]	Yes <u>✓</u> No □ N/ARMK#
11.	Before off-site transportation, does the generator placard or offer the appropriate DOT placards to the initial transporter? [3745-52-33]	Yes <u>✓</u> No □ N/ARMK#
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	Dem weeks were missed due to employee the a additional 136 dulies.	having to

RCRA HAZARDOUS WASTE GENERATOR INSPECTION CHECKLIST

# PROHIBITIONS

1.	Is use waste	d oil being managed in a surface impoundment or pile? If so:	YesNoN/ARMK#
	under	surface impoundment or waste pile being regulated OAC 3745-54 to 3745-57 or 3745-65 to 3745-69? -279-12(A)]	Yes No □ N/A /RMK#
2.	Is use 12(B)]	d oil being used as a dust suppressant? [3745-279-	Yes □ No _ N/ARMK#
3.	Is off-	specification used oil fuel burned for energy ery only in devices specified in 3745-279-12(C)?	Yes No D N/ARMK#
USED C	OIL GEI	NERATOR STANDARDS	*
4.	Does only a	the generator mix hazardous waste with used oil s provided in 3745-279-10(B)? [2745-279-21(A)]	Yes No □ N/A ½ RMK#
5.	1,000 hazard	the generator of a used oil containing greater than ppm total halogens manage the used oil as a dous waste unless the presumption is rebutted ssfully? [3745-279-21(B)]	Yes No □ N/AŔMK#
6.	contai	the generator only store used oil in tanks, ners, or units subject to OAC 3745-54 to 3745-57 or 65 to 3745-69? [3745-279-22(A)]	YesNo □ N/ARMK#
<b>7.</b>		entainers and aboveground tanks used to store oil in good condition with no visible leaks? [3745-2(B)]	Yes <u>✓</u> No □ N/ARMK#
8.	for und	ntainers, above ground tanks, and fill pipes used derground tanks clearly labeled or marked "Used 3745-279-22(C)]	Yes No □ N/ARMK#
9.	Has th	e generator, upon detection of a release of used ne the following: [3745-279-22(D)]	
	a.	Stopped the release?	Yes No □ N/A <u></u> RMK#
	b.	Contained the release?	Yes No □ N/ARMK#
	C.	Cleaned up and properly managed the used oil and other materials?	Yes No □ N/ARMK#
	d.	Repaired or replaced the containers or tanks prior to returning them to service, if necessary?	Yes No □ N/ARMK#
10.		he generator burn used oil in used fired space s? [3745-279-23] If so:	YesNo_/N/ARMK#

	a.	Does the heater burn only used oil that	Yes No D N/A MK#
		owner/operator generates or used oil received from household do-it-yourself (DIY) used oil generators?	
	b.	Is the heater designed to have a maximum capacity of not more that 0.5 million BTU per hour?	Yes No □ N/ARMK#
	C.	Are the combustion gases from heater vented to the ambient air?	Yes No □ N/ARMK#
11.	transp genera	the generator have the used oil hauled only by orters that have obtained an EPA ID#, unless the ator qualifies for an exemption pursuant to 3745-4 (self transportation or tolling agreements)? [3745-4]	Yes ∠ No □ N/ARMK#
USED C	OIL COL	LECTION CENTERS AND AGGREGATION POINTS	
12.	the ge	DIY used oil collection center in compliance with nerator standards in 3745-279-20 to 3745-279-24? 279-30]	Yes No □ N/ARMK#
13.	Is the Ohio E	non-DIY used oil collection center registered with EPA? [3745-279-31]	Yes No □ N/ARMK#
14.	genera	used oil aggregation point in compliance with the ator standards in 3745-279-20 to 3745-279-24? 279-32]	Yes No 🖸 N/ARMK#
NASTE	EVALU	JATION	
15.	Have a [3745-	all wastes generated at the facility been evaluated? 52-11]	Yes No □ N/ARMK#

REMARKS



# Jefferson Smurfit Corp (U.S.) DI-NA-CAL® Label Group Norwood Plant

Smurfit - Stone Di Na Cal Label Group Beech St - Cincin.

RECEIVED OHIOEPA

APR 26 2002

SOUTHWEST DISTRICT

April 25, 2002

Debora Depweg

**Environmental Specialist** 

OEPA, Div. Of Hazardous Waste Management. Southwest District Office

401 East Fifth Street

Dayton, OH 45402-2911

Airborne Express

6901002091

RE: Jefferson Smurfit Corporation (U.S.), DI-NA-CAL Label Group

Norwood Plant, Norwood, Ohio. EPA Generator ID#OHD056487101

Ms. Depweg

Thank you for coming out and spending time with us to discuss our process. We have received your inspection report from your April 10, 2002 visit to our facility.

While we had a violation of the management of containers, and we immediately corrected the problem, we reinforced the management of the containers during our April 11<sup>th</sup> and 12<sup>th</sup>, 2002 RCRA training classes.

Our annual review of personnel training was accomplished on April 11 and 12. We made sure that key personnel were present during the training. Additionally, David Hutchinson was also trained during this time.

For the hazardous waste storage weekly inspection, we have changed our process and added two additional persons as a backup to Mr. Lerman, who currently performs the weekly inspections. This process was necessary so that the weekly inspection would not be inadvertently missed.

We will submit the hazardous waste report as soon as the software program becomes available.

We have also added RCRA refresher training to our Job Skills Review program for the Pre-Make Ready Utility position. This will insure that employees who are transferred to this position receive the proper training.

We wish to thank you for your positive comments that were made regarding our pollution prevention activities and our RCRA training for supervisors. If you have any questions, please feel free to contact Lonnie C. Grayson at (513) 396-5627.

Lonnie C. Grayson,

Sincerely,

Division Plant Engineer.

Cc: T.Skiba, B. Ballman, A. Chiaruttini





APR 1 9 2002

# Jefferson Smurfit Corp (U.S.) DI-NA-CAL® Label Group Norwood Plant SOUTHWEST DISTRICT

April 18, 2002

Debora Depweg

cc: T.Skiba; B. Ballman

**Environmental Specialist** 

OEPA, Div. Of Hazardous Waste Management. Southwest District Office 401 East Fifth Street Dayton, OH 45402-2911

Airborne Express 6901004294

RE:

Jefferson Smurfit Corporation (U.S.), DI-NA-CAL Label Group

Norwood Plant, Norwood, Ohio

Ohio EPA Facility ID: 14-31-37-0116, EPA ID#OHD056487101

Ms. Depweg

Enclosed are the following items:

- The training material that was used during our recent RCRA training program at our plant.
- Sign in sheet for the training.
- Copy of the facility Integrated Contingency Program.

If you have any questions, please feel free to contact Lonnie C. Grayson at (513) 396-5627.

Sincerely,

Lonnie C. Grayson

Division Plant Engineer

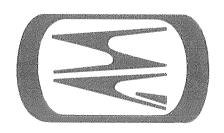
# MAIN TOPIC: RCRA, ICP OTHER TOPIC: Safety plan, recent drill review.

DI-NA-CAL Label Group Norwood Plant certifies that the following signed employees have received training in the above mentioned program(s) at the below listed date.

DATE: April 11-12, 200	
Anderson	Jenny Jenny anderson
Ashorn	Robert Approx
Baker	Robert Holy Na
Ballman	Brian
Bauer	Gary for land
Binkley	Donna MARIA WARLAN A
Borgemenke	Daniel Manuel Borgomente
Brown	Tamara Jammy Blown
Burton	Samuel O
Burwick	Daniel Nan Swurk
Byrd	Danny Vando
Campbell	Leonard
Chadwell	Connie DE CARQUEU
Check	Carolyn Cherk
Coffey	Steven
Colson	Gary May W. Colsot
Conley Your No	Scott A Contract of the Contra
Conner	Lanna Lanka Canner
Cook	Dallas Wolls Parks
Cook	Melanie
Cooper	Douglas Glory Caep
Cooper	Philip A Co
Crotty	Lisa Chatta
Crump	Chryll Cheyl Creey
Cunningham	John College
Dennis	Marty
Downey	Robert Daniel
Edrington	Wanda
Ense	Bruce Sure American
Ferguson	James Jun Telgum
Flischel	Michael Michael Phochil
Foley	Michael Michael Potology
Freeman	Susan Tilegran
Frey	John The British
Fuller	Kenneth L Faller fr
Gaffney	John / /
Glancy	Frank Joseph a
Glaser	Marilynn
Gravson	Lonnie

Рефенентациона менен чен это насамадами.	
Grohs	Carl C
Harper	Donna DOMAJ Harper
Haverland	Sharon Sharm phychlonol
Herbe	Dave Dave Herbe
Higgs	Tina
Hines	Donald
Hipp	Steven Statem High
Hutchinson	David Mr. David Huterbrun
Jacobs	Glenn De Z. Pe
Kessler	Leonard want Kerster
Kimble	Gregory Lugar W. Kont 6
Kirn	Mark Mark Em
Kisker	Dave Track Marin
Knepper Jr.	Richard Charl Known
Laflin	William
Lerman	Rick Charact Jeann
Liebert	John Aok Liebert
Martin	Ruth lith Massin
Mattson	Patricia
McCulley	Diana
McKoy	Butch
McWilliams	Marnike WYTMW MCW) Lliamo
McWilliams	Luther LAX William
Mills	Daniel Daniel 1 mills
Mourer	Bill
Myrick	Michael Wedard and and
Ogden	William
Oligee	Tom
Painter	J.Dave J Lar Put
Patterson	Yvonne
Patton	Carolyn Dottm Carolyn
Reynolds	Oscar OSCAPA Roemoles
Reynolds	William By J. P. And
Rogers	Carl Carl RhageRS-
Rogers	Teresa
Rolfes	Thomas 1) A
Ruggles	June Way Zhicole
Scott	Jackie Jacque Stoth
Sensel	Robert Sobut Server,
Shanks	Andre Amory Sagarda
Skiba	Terry T
Smith	Joshua Joshua Smith
Stevens	George Rola Sheres
Stockwell	Amie Amie
Sunderhaus	Andrew Andrew Of Switcher
Swisher	Jim Juli Tura
Throckmorton	Larry
TIN OCKNINOLION	ardit A

Thurmond	Rodney Rodney Murmini
Urlage	Judy
Van Bever	Mo M.O. Van Be
Von Hagel	Tom Jour lander )
Voorhees	Don Jon Joshels
Wade	Harold (The Wash
Wagner	Robert
Wainscott	Sandy Syndea & Glairscoll
Walker	James
Wall	Debby Neberal Wall
Wall	Robert John Wall Mr.
Walley	William Coldlean Estalles
Walters	Daniel Kanuballitt
Wiehoff	Gregory Mugay E. Wiebol
Wilcox	John All Walley
Williams	Cynthia C C
Wood	Benjamin Bury wood
Woodrum	Ron Kry Blood 9
Woster	Fatima Latrina Coste
Yee	Iggy Dear Ma
Yelton	Karen DD ( ) ( ******************************
Yorio	Matt
Zutterling	Sandy Sandy Zuther
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strebe Harris	1 10 pc
Harris	Gertha Verthe Harry
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# INTEGRATED CONTINGENCY PLAN

Hazardous Materials Program
Hazardous Waste Contingency Plan

**Jefferson Smurfit Corporation (U.S.)** 

**DI-NA-CAL NORWOOD** 

Norwood, OH

Last Revised: April 02

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# **DI-NA-CAL Norwood Integrated Contingency Plan**

# SECTION ONE-- PLAN INTRODUCTION

#### 1. Purpose and Scope of this Plan

The purpose of this Integrated Contingency Plan (ICP) is to provide a planned, coordinated response procedure for each "conceivable" plant emergency including emergencies concerned with hazardous waste spills. Since most employees are limited in the emergencies they may respond to, DI-NA-CAL Norwood has developed a Plant Emergency Organization (PEO). The purpose of the PEO is to assist and aid employees during emergencies, preserve the integrity of equipment and utility systems, reduce overall property loss, and protect the environment.

The Plant Emergency Organization (PEO) is designed to ensure that all shifts have responsible, trained employees available to assist in emergencies. A discussion of each PEO position is provided below. A current PEO Organization Chart is shown on Page 7 of this written Plan. Additional information about the PEO and employee roles in emergencies can be found in Annex 3. A table of contents can be found in the front of this Plan. The Annexes (appendices) can be found in the back.

While the PEO is critical in emergencies, all employees and contractors must be trained on and familiar with general plant emergency procedures. This written Plan is designed to explain to employees what the standard emergency responses are for this plant. Employees will also learn about the equipment, tools, and practices used to help protect them, such as emergency equipment and spill control devices. The Plan also explains communication, notification, and the chain-of-command used during emergencies.

Another purpose of the ICP is to meet the requirements of 40 CFR 265, (RCRA - Hazardous Waste), along with any State Regulations that may accompany or supplement the federal regulations. The Integrated Contingency Plan details the emergency response procedures that will be followed in the event of any plant emergency, including emergencies involving hazardous waste spills in storage areas. The following section contains more detailed information related specifically to the hazardous wastes generated at the plant.

#### 2. Description of Site Activities

In the printing of heat-set labels, inks, solvents, lacquers, primers and coatings are used throughout the process. Solvents are stored in bulk form in four (4) 5,000-gallon underground storage tanks located outside behind the plant building, as well as in drums and pails in the ink & solvent storage areas. Lacquers, primers and coatings are also stored in drums in these areas. Point-of-use containers containing these materials are stored in the pressroom in minimum quantities as

required for production. Totes are also used to store varnishes. These are stored in the first floor ink vault.

Hazardous wastes generated during the production process include waste solvents, and solid absorbent materials used during press cleanup and general cleaning in the pressroom.

The primary hazard associated with the hazardous wastes generated at this site is flammability or ignitability, resulting from the low flash point of the solvents. The associated hazardous waste codes assigned to these types of waste are D001, D035, F003, and F005. These waste codes reflect the ignitability of the solvent constituents present in the waste generated by the printing process.

The DI-NA-CAL Norwood facility is a large quantity generator (LQG) of hazardous waste. Waste material is accumulated in 55-gallon drums, stored less than 90 days, and is customarily shipped to two hazardous waste treatment and disposal facilities operated by Rineco Chemical or Petra-Chemical Processing Inc. There may be up to 100 drums of Hazardous Waste or "Recyclables" in temporary storage at any time.

Hazardous waste is stored in the hazardous waste storage room and the ink vault located on the first floor of the plant. Refer to the facility map/chemical locator map in **Annex 1** for the exact locations. The hazardous waste storage areas are formally inspected on a weekly basis to ensure there are no leaking drums, that drums remain in good condition, and to verify that there is no storage or security problems while the drums await pick-up and disposal. It is plant policy that floor drains in process and storage areas shall be removed. Through renovations nearly all floor drains have been removed. The final few floor drains are scheduled for removal.

The hazardous waste storage areas are enclosed within the plant building and the area is equipped with adequate fire protection, security, and a telephone. The hazardous waste storage area is equipped with curbing to provide spill containment and prevent any releases from leaving the immediate area until spill cleanup measures are performed.

# 3. Corporate Regulatory Commitment

The Jefferson Smurfit Corporation, Consumer Packaging Division, DI-NA-CAL Norwood Plant #454 is firmly committed to providing each employee a safe and healthy work environment. A safe work environment is a component of corporate policy as well as an important regulatory requirement under the Occupational Safety and Health Act (OSHA). In order to provide a safe work environment, OSHA requires certain steps to be taken to provide for employees during emergencies.

The Environmental Protection Agency is responsible for keeping the environment safe. Therefore, the EPA requires DI-NA-CAL Norwood to manage its chemicals, wastes, and any spills that may result from handling and using these materials. Furthermore, other governing bodies like the City of Norwood require this plant to have specific procedures for handling emergencies as well. As a result, an Integrated Contingency Plan has been created to cover the regulatory requirements pertaining to plant emergencies, including chemical spills. Specific regulatory citations such as 29 CFR 1910.38 and 40 CFR 265 addressed by this Plan can be found in **Annex 8**.

In response to the above regulatory requirements and corporate policy, the Environmental Health and Safety Manager (EH & S Manager) will work closely with Area Supervisors to train all affected employees on emergencies in this plant, and any other information that pertain to work place environment, health, and safety. An employee can obtain a copy of this Plan from the Area Supervisor or the EH & S Manager. This program should be reviewed annually or if any changes occur in the plant or its processes. Plan amendments can be found in Annex 6.

### 4. General Facility Identification Information

The Jefferson-Smurfit Corporation is based in Clayton, Missouri but operates DI-NA-CAL Norwood Plant #454 in Cincinnati, Ohio (Norwood). DI-NA-CAL Norwood is in the business of rotogravure printing using paper, foil, and heat transfer labels applied to consumer packaging containers. These printing processes involve the use of inks, lacquers, primers, and coatings. The fact that there are solvents and other hazardous materials used on-site during press operations, means related hazards of such operations must be discussed with employees, including related emergency procedures. LINK-- the Hazard Communications Program further discusses workplace hazards, as well as chemicals present in this plant and their related hazards.

#### **FACILITY INFORMATION**

Jefferson Smurfit Corporation, Consumer Packaging Division

DI-NA-CAL Norwood/Plant #454

Physical/Mailing Address

4500 Beech Street Cincinnati, Ohio 45212

ntv of: Hamilton

County of:

Longitude/Latitude: 84° 27' 30"N/ 39° 9' 0"W

Facility Main Phone Number: (513) 396-5600 24-Hour Emergency Number: (513) 396-5666

Fax Number: (513) 396-5615

3 DI-NA-CAL Norwood ICP LCG Revised 04/02 E-Mail: TSkiba@smurfit.com

EPA **1431370116** SIC: 2754

Key Contact: Plant Manager, Mr. Dave Kisker pager # (513)383-5857

**Emergency Response Vendor:** 

Clean Harbors, Mr. Mike Janna at 1-800-645-8265

**IMPORTANT NOTE:** A facility map can be found in **Annex 1** 

#### 5. DESCRIPTION OF PLANT EMERGENCY ORGANIZATION (PEO)

The purpose of the PEO is to assist and aid employees during emergencies, preserve the integrity of equipment and utility systems, reduce overall property loss, and protect the environment. In emergencies, the Emergency Coordinator (EC) can activate the PEO Squads by calling or paging key members. When members of the PEO are summoned they take instructions from the EC. The PEO Squads can be utilized to respond to any emergency. The basic roles and responsibilities of the PEO squad members are discussed below. More information can be found in **Annex 3** of this written Plan.

#### Responsibility

The Emergency Coordinator is responsible for coordinating all emergency situations, including instituting the appropriate phases of the Integrated Contingency Plan when notified of:

- a. Fire or explosion in the plant or yard.
- b. Spillage of hazardous materials or hazardous waste in the plant or yard.
- c. Any other hazardous waste incident the EC deems appropriate.

# PEO Roles

#### **COMAND AND COMMUNICATION**

# **Emergency Coordinator (Person In Charge or Incident Commander)**

- Has full responsibility and command until Fire Department arrives
- Decides if employees should be evacuated -- gives verbal command
- Directs Notifier, EC Runner, Fire Squad, Fire Extinguisher Gatherers, Salvage, Sprinkler Control and Plumbers/Electricians
- Coordinates all activities with the Norwood Fire Department and other regulating agencies who might respond
- Decides when the building can be safely re-entered and employees can return to their work areas and begin operations again.
- The EC is in charge of overseeing waste disposal and completing the incident/accident form.
- The EC is also responsible for all official communication including reports to regulators, statements to the media, interactions with emergency responders, and the fire department. A notification list can be found in **Annex 2**.

#### Notifier

- The EC will direct the Notifier to personally call the fire department and/or police, and any other regulating agency specified by the EC or Fire Chief
- The EC may use the Notifier for all outside communications during emergencies

#### **EC Runner**

- The key role for the EC Runner is to provide employee/departmental roll call information to the EC after an evacuation or shelter-in-place incident
- The EC may direct the EC Runner to assist in any search and rescue procedures, or other tasks related to attendance

#### **PLANT EMERGENCY SQUADS**

Fire Squad-- Locate and control fire to the degree possible

The Fire Squad can respond to incipient fires (those that have just begun). The members are trained on hose lines no larger than 11/2" in enclosed structures, and hand-held extinguishers. Members are drilled annually (OSHA Subpart L). Squad members can also provide defensive fire fighting until the fire department arrives, as long as a clear exit route exists. Duties include:

- Ensure all employees are removed from Area
- Cut-off electrical or process equipment in Area
- Securely cover and remove containers of flammables from Area
- Begin fire fighting with hand-held extinguishers as soon as possible
- Operate any fire pump or act as fire hose operator(s)

# Salvage -- To minimize damage to property and injury to employees

- May assist the EC Runner/Fire Department in searching the plant to ensure all employees have been evacuated
- Begin restoration and salvage operations as soon as possible, and attempt to get systems restored to normal operation
- Salvage all useful materials
- May recruit additional employees to assist

# **Sprinkler Control (Accidental Activation or Actual Fire)**

- Any employee discovering an activated sprinkler should call the Area Supervisor immediately
- Only the EC, PEO, and Area Supervisors are allowed to take action steps to control sprinkler discharge
- Assists Plumber in ensuring the operation and turning-off of sprinklers

# Plumber (Piper)

 Knowledgeable about plant gas, steam, water, flammable liquids and air piping system

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- Must be prepared to shut-off any or all systems
- After any emergency involving the sprinklers, the piper will replace all fused sprinkler heads as soon as possible

#### Electrician

- Knowledgeable about shut-off of power and ventilation to the plant
- Bring on-line auxiliary power systems
- Secure, control, and correct electrical hazards
- Ensure electric power to any response equipment

# 2001 PLANT EMERGENCY ORGANIZATION CHART

If the primary coordinators are unavailable then the alternate coordinators are paged. In the event of an emergency during off-hours when no Coordinator or Area Supervisors are present, employees shall call Security immediately by dialing the main #396-5666 and any extension number.

# **Primary Emergency Coordinators**

1. Dave Kisker pager #308-6716 cell phone # (513)383-5857

Lonnie Grayson cell # 383-7703
 Terry Skiba pager # 308-8245

4. Brian Ballman cell # 383-5858

# All emergencies must be promptly reported to EH & S Manager, Lonnie Grayson at cellular phone # (513) 383-7703

## **Corporate Environmental Affairs Emergency Primary Contact**

(Please contact the below listed numbers in the order given)

Al Chiaruttini, Manager

Office 610-935-4006

Environmental Services

**Secondary Contacts** 

Curtis Barton, Director Office 770-621-6707

Environmental Affairs Sect's 770-621-6712 (April Tugman)

Fax 770-621-6733

Nina Butler, Env. Counsel Office 770-621-6741

Smurfit-Stone Container Corporation Sect's 770-621-6705

Fax 770-621-6733

Roy Cobb, Env. Counsel Office 314-746-1154

Smurfit-Stone Container Corporation Sect's 314-746-1144

Fax 314-746-1333

**Important Note:** For a complete notification list, please see Annex 2. **Notifier** On-Call **EC Runner** On Call PLANT EMERGENCY TEAMS FIRE EMERGENCIES (Supervisors are trained in basic first aid and CPR) First Shift Second Shift **Third Shift** Weekend Fire Chief L.Conner S. Wainscott S. Coffey S.Wainscott Supervisor Supervisor Supervisor B. McKoy Fire Squad On call On call On call On call Leader **Alternate** On Call On call On call On call Salvage Squad R. Lerman On call On call On call Sprinkler On Call On Call On Call On call Control On Call On Call On call On call

Plumber andO. ReynoldsOn CallG. ColsonOn callElectricianJ. PainterOn CallS. BurtonOn call

# SECTION TWO-- CORE PLAN ELEMENTS

# 1. Discovery

Discovery addresses the initial actions of the employee discovering an emergency incident, what steps the employee will take to assess the problem, and procedures for calling for help.

#### Procedure for Contacting the Emergency Coordinator/PEO

In any emergency, the employee will notify the Area Supervisor immediately. Then, the Area Supervisor will call or page any additional Emergency Coordinators (EC). On second and third shift, the Area Supervisor, my be the Emergency Coordinator. Depending on the severity of the incident, the EC may determine the incident is indeed an emergency. At this point, the EC may elect to call or page one or all of the alternate coordinators, and call the PEO Squad members to assist. The EC or Alternate Coordinator is in charge of the incident until the emergency is over or fire department arrives and takes command and control.

# Requested Information When Reporting an Emergency

The following information is needed to help assess a potential emergency:

- Call Area Supervisor personally or using a "buddy"
- State Name and Location in Plant
- Give Description of Incident (i.e. fire, chemical spill etc...)
- Report Spill Quantities of Materials, Affected Areas, Employees Involved
- Report Injuries or need for first aid

#### 2. Initial Response to Emergency/Spill

After discovering the incident and reporting it to the Area Supervisor, process employees may take steps to control the situation. The Area Supervisor, at the direction of the EC, may begin evacuation procedures. Employees who are not trained on PEO procedures such as chemical spill control, or fire-control techniques must leave the affected area, as directed by the Area Supervisor or EC. If needed, the EC will request additional assistance from an outside agency.

#### 3. Sustained Actions

If the emergency can be easily handled by process employees, then these employees will continue to address the incident until it has been mitigated. If the emergency incident IS NOT controllable, then the EC will take control and direct process employees and/or PEO Squads as long as necessary, and/or call in the fire department or the outside emergency response vendor.

## 4. Termination and Follow-up Actions

The EC (or Alternate EC) is in charge of declaring the emergency to be over.

 The EC will determine when it is safe for employees to return to their work areas and begin operations again.

- The EC is in charge of overseeing waste disposal, restoring emergency equipment supplies, and completing the incident/accident form. This Form can be found in **Annex 4**.
- The EC is also responsible for all official communication including reports to regulators, media statements, interactions with emergency responders, and the fire department.

# SECTION 3-- STANDARD PROCEDURES FOR RESPONDING TO PLANT EMERGENCIES

At DI-NA-CAL Norwood, the two most likely emergencies are the potential for a chemical spill and/or fire. However, other emergencies such as severe weather may arise so five general emergency response procedures have been developed. The procedures for the emergency scenarios are discussed below. They are:

- chemical spill
- fire or explosion
- evacuation procedures (includes severe weather)
- health emergency

# **Summary of Basic Response Procedures**

Any employee discovering a release of hazardous chemical that is not easily controllable with the available equipment must contact the Area Supervisor immediately. The Area Supervisor will decide to call the Emergency Coordinator (EC). The EC will decide what additional steps are needed, including calling in the PEO.

After initial notification, all employees not involved in the emergency or spill clean up will be moved out of the area at the direction of the Area Supervisor or the EC. Employees will assemble at their assigned collection points (either inside or outside of building based on the emergency type).

Once assembled, the Area Supervisor will take roll call and report to the EC. The EC will assess the situation further, and determine if the fire department or other regulating agencies need to be contacted. Again, the EC or the Notifier alone will contact all emergency responders /regulating agencies.

# 1. Chemical Spill Emergency

Most chemicals can be found in process areas, storage areas, and the dock. Smaller amounts may be found in the maintenance. However, these materials get handled and moved around the plant, which means spills can occur. Most often, spills occur in the Press Areas, but they can occur elsewhere. For this reason, there are general spill procedures for Process Area employees. To help employees understand where chemicals are located, a Chemical Locator Map can be found in **Annex 1** of this written Plan.

#### **Spill Control Procedures**

The following spill procedures apply to hazardous materials or hazardous waste in the process areas, maintenance areas, and loading dock. As outlined above, only trained employees are permitted to control or clean-up spills of hazardous materials. The procedures given here are spill control procedures. LINK--Specific job duties and activities related to hazardous waste and its' management are outline in the Hazardous Waste Management Program, in Appendix G-- Job Descriptions.

- Notification-- the <u>first step</u> in a spill emergency is to isolate the involved area by removing employees, and if needed, position other employees at entrances to prevent any entry to spill area. If possible, process employees should also attempt to cover any open drains using the magnetic drain covers. The <u>second step</u> for the employee or buddy is to notify the Area Supervisor, who will then notify the EC if needed. The EC will help the Area Supervisor assess the situation and decide on an appropriate response.
- Containment and Control-- the third step is to collect spill clean-up materials and equipment (a buddy could help with this). Put on or "don" all types of PPE. In certain cases, where circulation is poor or the area is enclosed, respiratory protection might be needed, and the Area Supervisor or Foreman may request employees wear respiratory protection. The fourth step is to implement other spill control and other containment procedures as quickly as possible, like covering or barricade spills and drains using the magnetic drain covers and various absorbent material. If a fire is involved in a spill emergency, where possible process employees will disconnect electrically-powered equipment, remove flammable materials, and use hand-held foam or other fire extinguishers to minimize the effects of a fire, until back-up help has arrived. All used absorbent materials will be placed in DOT-approved drums and labeled as hazardous waste, in addition to managing any liquid wastes generated from fire fighting activities.
- Follow-up Actions-- the <u>fifth step</u> involves the EC who will aid and help coordinate employees for the collection and management of hazardous wastes, until the time when those wastes are removed for disposal. All hazardous wastes shall be stored in the Hazardous Waste Storage Room/Ink Vault. The EC will also ensure that all emergency equipment and spill control cabinets are restored to fully operational status. The Gravure Foreman will assist the EC in this task. The <u>sixth step</u> includes the EC, assisted by two other qualified persons, who will investigate the cause of the emergency, review and critique the incident to determine if changes in operating procedures or best management practices are required. Qualified persons usually include Area Supervisors and/or the EH & S Manager.

Incident Closure-- prior to allowing work to resume in the affected area, the
EC will ensure that the emergency has been eliminated, and that the clean up
has progressed to the point where employee health and safety will not be
affected. Then, the EC will allow employees to return to the work area. Once
the emergency has been reviewed, the EC will file the final reports. The EC
will also make any necessary calls to the regulating agencies.

# 2. Fire or Explosion Emergency

In the event of any fire or explosion, an employee or "buddy" shall immediately notify the Area Supervisor, who will then call the EC if needed. A trained employee may undertake defensive fire fighting, but must retreat if fire becomes too large. Employees shall alert the Area Supervisor and Emergency Coordinator if any fire extinguishers have been discharged. Discharged extinguishers should be tagged out, and re-charged and replaced as soon as possible by the EC (or Area Supervisor). All fires and explosions, regardless of size, require an incident/accident form to be completed

#### **Basic Fire-Fighting Techniques (FIRST FEW MINUTES ARE CRITICAL!)**

- Notify Others-- Give Loud Verbal Warning-- Fire! Fire!
- Employee/Buddy Must Notify Area Supervisor (sound the plant alarm system)
- Employees Close Doors To Affected Area (<u>after</u> ensuring all employees are out of the affected area(s)
- Gather Extinguishers and Fire Fighting Tools
- Area Supervisor or EC will begin calling for fire department/PEO members
- Shoot and Sweep Hand-held Extinguishers Across Base of Fire
- Activate wall and support mounted fire hoses/foam producing equipment
- If EC or AS calls 911/Fire Department, one designated employee will assist the FD is locating the plant and the fire location (stand watch in front of plant)
- If possible, Continue Fighting Fire w/ Extinguisher Until Fire Completely Out
- Confirmation by EC, Fire Department, or Area Supervisor

Silco is the vendor who tests and maintains all CO2 systems and hand-held fire extinguishers on-site.

# 3. EVACUATION

# **BUILDING Evacuation Procedure and Plan**

This procedure covers emergencies involving fires, earthquakes, or large chemical spills that require evacuating the building.

**Alarm Code**: The plant alarm signal will signal in the event of a fire. In the event of a chemical spill or an earthquake, the EC or supervisor will give the alarm signal for employees to exit the building.

Assembly Areas: Each work area has a primary evacuation route, but employees should not hesitate to use an alternate route, if the primary route is blocked. Evacuation route maps are posted by exit and doors. Actual routes are shown in Annex 1 of this Plan. Upon leaving the building, employees must collect in their designated areas to be accounted for during roll call. No one may leave the collection point without authorization from the Area Supervisor or EC. EMPLOYEES MUST USE EVACUATION ROUTE AND COLLECTION POINT CLOSEST TO WHERE THEY ARE!!! EMPLOYEES SHOULD NOT ATTEMPT TO RETURN TO REGULAR WORK AREA. EXIT AT NEAREST POINT!!!

**During Emergency**: Each Area Supervisor will take roll call for his/her department. The Area Supervisor will select an employee to act as a Runner. The Runner will take the roll call information to the EC or Fire Chief. Only the EC or Fire Chief will implement a search and rescue for any missing employees or contractors.

**Follow-up to Emergency**: An employee acting as a Runner for the EC will notify the Area Supervisor in each collection point, when it is safe to return to building.

#### **WORK AREA Evacuation Procedure and Plan**

This procedure covers a specific type of emergency. The primary concern is severe weather, like a hurricane or tornado. To a lesser degree, we are concerned with chemical spills that occur OUTSIDE the plant, perhaps at a neighboring facility. When these emergencies occur we are required to "shelter-in-place", which means employees move from work areas to sheltered areas in the building.

**Alarm Code**: EC or Area Supervisor will actuate the alarm signal for employees to exit their work area and go to "shelter-in-place" collection point.

**Assembly Areas**: There are four main assembly areas for employees on the INSIDE of the plant. Evacuation route maps are posted by exit doors. Actual routes are shown in <u>Annex 1</u> of this Plan. When employees have assembled, roll call will be taken by the Area Supervisor. The inside collection points will be:

- A. Finishing, Maintenance, Dock and Upper Floor Employees—Collect in NW corner of Finishing Dept. next to Dinacal Eng. entrance
- B. Dinacal Engineering-- Hallway between their office area and the shop area outside the parts storage area.
- C. Office Employees-- Collect in hallway outside of the Barco office entrance door
- D. Employees Working on Upper Floors-- Ground Floor in Aisle between Q.C. Lab and the Cylinder Storage Area north of the Lab.

**During Emergency**: No one may leave the collection point without authorization from the Area Supervisor. During a tornado, the best place to be is inside under a large heavy structures. If a tornado threatens to actually touch down nearby or hit the building, employees will get into a squatting position, clasp hands behind their head, and put head down to knees. Each Area Supervisor will take roll call for his/her department. The Area Supervisor will select an employee to act as a Runner. The Runner will take the roll call information to the EC or Fire Chief. Only the EC or Fire Chief will implement a search and rescue for any missing employees or contractors.

**Follow-up to Emergency**: An employee acting as a Runner for the Emergency Coordinator will notify the Area Supervisor in each collection point, when it is safe to return to work areas.

# 4. Health Emergency

<u>ALL emergencies, including injury and illness, require employees to contact nearest Area Supervisor for assistance</u>. Certain supervisors and employees are trained on basic first aid and CPR. These employees are on-call by shift and will be contacted by Area Supervisor or Emergency Coordinator. **Only the Area Supervisor or EC should call 911!** 

# 5. Mechanical System Failure

<u>ALL emergencies, including mechanical system failure, require employees to contact nearest Area Supervisor for assistance.</u> Maintenance employees and certain process employees are trained to assist in these emergencies. During full-scale emergencies the EC or Fire Department may call on PEO members to assist with system shutdown.

# SECTION FOUR-- DESCRIPTION OF EMERGENCY EQUIPMENT

The equipment listed below shows the type of equipment and the quantity on-hand at DI-NA-CAL Norwood. In the case of a large-scale emergency, it is possible to "borrow" additional emergency equipment from outside agencies such as the Norwood Fire Department or emergency response vendor. The list below shows what is typically available through the spill stations in the process areas. Certain items must be obtained through the Area Supervisor. Monitoring equipment is kept and maintained by the EH & S Manager.

# 1. Personal Protection Equipment

Level C Respirators (assigned to certain employees only)
Replacement Cartridges
Non-encapsulating Tyvek Cover-alls
Rubber Boots
Disposable Gloves

## Goggles/Shields

## 2. Fire Fighting and First Aid Equipment

Hand Held Fire Extinguishers

Dry Chemical	A,B,C	SIZE	70
Halon	A, B, C		8
Water	Α		19
CO2	B,C		27

Wheeled Cart Fire Extinguisher

CO2 B,C 12

Press Area CO2 Systems

Fire Blankets and Stretchers

## 3. Specific Equipment Located in Hazardous Waste Storage Area

Wall-mounted spill cabinet

1 wheeled CO2 fire extinguisher

3 AFFF foam extinguisher (2.5 gal)

Communications: 1 telephone

#### 4. General Equipment

Fork Lifts and Pallet Movers

Two Units

## 5. Chemical Emergency Monitoring Equipment

Combustible Gas Meter One Unit
Oxygen Concentration Meters One Unit

#### 6. Spill Control Cabinets

DI-NA-CAL Norwood has standard equipment for controlling spills. These materials are found in the Spill Control Cabinets located in process work areas and dock or maintenance. Each Spill Control Cabinets contains the following items:

Absorbent Products-- Pigs, rags, loose absorbents, and absorbent pillows Barrier Products-- Socks and snakes, soil, sand, Magnetic Drain Covers PPE Products-- Tyvek suits, gloves, goggles, and duct tape Non-sparking Tools-- Available from Area Supervisor

## 7. Additional Spill Response Equipment

As noted above, some items like the non-sparking tools are available through the Area Supervisor. The EH & S Manager can provide spare or salvage drums,

containers, hazardous waste and warning labels, as well as Oxygen/LEL monitors. In the event of injuries, there are first aid kits available as well.

## 8. Responsibility for Emergency Equipment

It is the responsibility of the EC and the Area Supervisor to ensure that there is sufficient spill control equipment in the spill control cabinets located in the process areas. In total, the EC is required to store enough absorbent materials to absorb and contain a spill of five 55-gallon drums on hand at this site. Specific use of spill equipment is covered in during on-the-job training. As part of our preparedness, DI-NA-CAL Norwood also has access to additional spill supplies and equipment available from the Norwood Fire Department or Clean Harbors during large-scale emergencies. If needed, the EC will make these arrangements.

# SECTION 6-- ADMINISTRATIVE AND TRAINING REQUIREMENTS

# 1. Training

All employees must be trained on basic emergency procedures. Employees must have additional training before they may respond to:

- Chemical Spills
- Fire Emergencies
- Sprinkler Activation
- Injury or Health Emergencies

<u>Under no circumstances should employees respond to emergency situations</u> <u>without additional training</u>. To work in the process areas, in addition to being trained on the material contained in this written Plan, employees are required to be trained annually on one or more of the following **LINKS-**

- Hazard Communications/Right-to-Know
- Hazardous Waste Management and RCRA Requirements
- Respiratory Protection
- Personal Protective Equipment
- Spill Control Practices
- Waste Minimization Program

Additional information about training/drill exercises can be found in **Annex 5**.

# 2. Filing an Incident/Accident Report

The EC will personally investigate any incident/emergency and complete an <a href="Incident/Accident Report Form">Incident/Accident Report Form</a> with two other qualified persons. The completed form shall be given to the EH & S Manager. The completed Form will:

- Identify the cause of the spill or leak;
- Identify any safety procedures that were violated or missing;
- Determine source of the incident, and see if situation was adequately covered by existing emergency procedures;
- Determine if the response effort and supply of materials adequate and appropriate to address the incident;
- Determine if employees were prepared to deal with the emergency, review procedures and determine what new procedures need to be added, and complete a change management form; and
- Assess whether the proper reporting procedures were correctly executed, in a timely fashion.

**IMPORTANT NOTE:** A copy of the incident/accident form can be found in **Annex 4** of this written Plan.

3. Interaction with the Norwood Fire Department, Local LEPC and Medical Care Providers

17 DI-NA-CAL Norwood ICP LCG Revised 04/02 The following activities are required for the safety of both our plant and any fire responders who might be called to this plant.

- Annual Facility Tour
- Annually Updated Chemical Locator List and Map
- Provide copy of fire protection diagram to Fire Department
- Conduct Mutual Training if requested
- Check to ensure DI-NA-CAL Norwood plant is included in LEPC Planning
- Submit Copies of integrated Contingency Plan to all parties

#### 4. Prevention Programs

#### **Written Programs**

As noted earlier, the primary concern for emergencies is the potential for chemical spills, or fires from handling and using flammable materials. But, most emergencies can be caught before they even start by practicing prevention techniques. In addition to the prevention techniques listed below, there are other tools and resources to help prevent emergencies, namely, **the Stormwater Pollution Prevention Plan (SWP3)** and SSCC Property Conservation Program. These documents can be found in **Annex 7**.

#### Common Techniques for Preventing Emergencies

- Grounding and Bonding Containers holding Flammable Materials
- Keeping Lids securely fastened to containers
- Good Housekeeping Practices like keeping aisle clear and work space neat
- Safe Work Practices like reading MSDS or reviewing operating procedures
- Properly Handling Hazardous Waste and Hazardous Materials
- Automatic CO2 Fire Suppression on Press 4 and 5
- Keeping Process Equipment in Good Working Order
- Annual Factory Mutual Inspections
- Monthly Plant Inspections
- Weekly Inspections
  - spill control equipment/supplies
  - hazardous waste storage areas
- Safety Committee meetings
- Daily, Routine Inspection and Prevention Maintenance
- Supervisor and Employee Training

#### 5. Program Evaluation

At a minimum, this program shall be reviewed annually, or if changes occur, or if the Plan does not adequately meet an emergency.

#### **Annexes**

Annex 1	Facility Map Chemical Locator Map Chemical Inventory List Evacuation Route Maps Fire Protection Diagram
Annex 2	Notification List
Annex 3	PEO Team Development Guidance Document
Annex 4	Incident and Accident Report Form
Annex 5	Training Materials, Drills, and Exercises
Annex 6	Plan Amendment and Plan Evaluation
Annex 7	Stormwater Pollution Prevention Plan (SWP3) SSCC Property Conservation Program
Annex 8	Applicable Regulatory Citation Matrix

Annex 1-- Facility Map
Chemical Locator Map
Chemical Inventory List
Evacuation Route Maps
Fire Protection Diagram

#### **Annex 2-- Notification List**

#### **Agency Notification List**

- 1. National Response Center 1-800-424-8802
- 2. OEPA Emergency Response Team 1-800-282-9378
- 3. State Emergency Response Commission 1-614-481-7000
- 4. Local Emergency Response Committee 1-513-821-1092
- 5. State Fire Marshal 1-614-282-1927
- 6. Metropolitan Sewer District 1-513- 557-7000
- 7. Local EPA Greg Howard 946-7721

#### **Information Needed By Responding Agency**

- 1. Name and Telephone Number of Incident Reporter
- 2. Name and Address of this Facility
- 3. Time and Type of Incident
- 4. Identification and Quantity of Material(s) Involved
- 5. Extent of Any Injuries
- 6. List of possible Hazards to Human Health and the Environment
- 7. Results of Role Call After Evacuation

#### **Other Emergency Numbers**

Those noted in bold are the phone numbers most frequently called when spills occur, especially those over the Reportable Quantity (RQ).

Norwood Fire Department 458-4550 or 911
Norwood Police Department 458-4550 or 911
EPCRA Hotline 1-800-535-0202
Bethesda Care (First Aid and Testing) 731-3399
Good Sam (Hospital) 872-2409
Emergency Spill Response Vendor
Clean Harbors/Mike Janna 1-800-645-8265

Releases to drains, surface water, plumbing network/sewer system Metropolitan Sewer District during business hours call 557-7000. After hours call 244-5500 (MSD Plant Manager), but must also call 557-7000 promptly on the next business day! National Response Center 1-800 424-8802 for amounts above RQ

The EC may also need to submit an incident report to the regulating agencies if:

- Spills larger than the Reportable Quantity (RQ)
- Spills enter floor drains into piping

#### **Annex 3-- PEO Team Development Guidance Document**

#### **Annex 4-- Incident and Accident Report Form**

### **Annex 5-- Training Materials, Drills, and Exercises**

#### **Annex 6-- Plan Amendment and Plan Evaluation**

# Annex 7-- Stormwater Pollution Prevention Plan SSCC Property Conservation Program

## **Annex 8-- Applicable Regulatory Citation Matrix**

#### **COURSE PURPOSE**

\*To train employees on the practices involved in the safe, legal management of hazardous waste, and the programs that support and control the presence of these materials on this site.

#### **COURSE REQUIREMENT**

- DI-NA-CAL Norwood is required to manage their hazardous waste in accordance with RCRA and various federal laws
- The rules and regulations surrounding these laws, are enforced by the OEPA
- \* RCRA was passed because of mismgt.

#### **COURSE OVERVIEW**

This course is divided into two general sections:

- 1. Hazardous Waste Management <u>Program</u>
- 2. Spill Control and Emergency Procedures

#### Defining Hazardous Waste

What is Hazardous Waste?

Hazardous waste begins its life as a hazardous material (solid, liquid or gas). Once the material has been used, and/or is no longer useful, the material is declared to be waste

UNLESS the material is recycled

#### Regulating Agencies Who Influence HazWaste Mgmt.

- U. S. Environmental Protection Agency (EPA) and OEPA
- Occupational Safety and Health Agency (OSHA)
- Department of Transportation (DOT)
- Nat'l Fire Protection Association (NFPA)
- \* City of Norwood Fire Department

#### Specific Regulatory Citations

The Code of Federal Regulations (CFR) provide a wealth of information about today's topics.

- 40 CFR 261 and 262 addresses definition and characterization of waste
- 29 CFR 1910 concerns employee health and safety (HazCom etc...)
- 49 CFR 126 and 181 transport issues

#### Cradle to Grave Management

- RCRA demands management from beginning to end
- \* Provides method of accountability
- \* Legally enforceable jail and fines
- \* Sets limits and timeframes
- Created Superfund to clean up abandoned sites

#### **ACCOUNTABILITY**

- \* Everyone gets an generator I.D. #!
- \* This number is used throughout the waste mgmt. and disposal cycle
- A hazardous waste manifest is the control document. It is a legally enforceable document!
- \* OEPA periodically inspects our plant

#### **WASTE GENERATOR**

Waste generators are divided into three categories depending on volume

- Exempt Small Quantity Generator- no more than 100 kilograms per month
- Small Quantity Generator 101-999 kilograms per month
- \* Large Quantity Generator- more than 1000 kilograms per month

#### **DEFINING WASTE CODES**

\* 40 CFR 261.23- 33 defines waste in two basic ways, by characteristic or source:

#### D Wastes Characteristic Wastes

- Ignitability- liquid w/ flashpoint below 140F
- \* Corrosivity- pH 2 or less, 12.5 or more
- \* Reactivity- unstable or explosive
- \* Toxicity- health or environmental hazard

10

#### EPA HAZARDOUS WASTE SOURCE LIST

- **\* Specific Source List**
- Non-specific Source List
- \* Discarded Commercial Chemical Product List
- \* Equipment Cleaning or Repair

#### **WASTE PROFILES**

- \* Defined by generator knowledge MSDS, and/or lab analysis
- Needs to be submitted to TSDF and accepted by them, before shipping
- \* TSDF must be permitted to accept
- \* Inaccurate profile will result in "offspec" fees. Could affect manifest!

#### Documenting HazWaste Transportation and Disposal

- \* A waste manifest is a <u>legally</u> binding document that follows a waste load throughout its lifecycle.
- \* Everyone involved gets a copy
- \* The generator must get the signed original back from the TSDF w/in 35 days. Keep manifests 3 years. Use EPA form 8700-22 and 22A

13

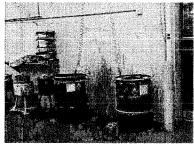
#### ONGOING MANAGEMENT

- \* Keeping up with paperwork
- \* Using the right containers (DOT)
- \* Replacing old or illegable labels
- \* Shipping before 90 day time limit
- \* Auditing the disposal facilities
- Inspecting weekly, and dating and labeling containers

4

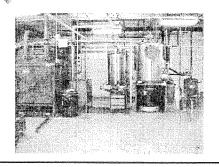


#### PRESS ROOM 101



15

#### PMR FIRST FLOOR



.

# THIRD FLOOR PARTS WASHER



...

## KNOW WHAT WASTE YOU ARE HANDLING!!!

- \* Get a copy of the MSDS and review it
- \* Understand key concepts of MSDS
- \* Know the hazards and how to affectively protect yourself
- \* Collect your tools before you start
- \* Inspect containers for damage
- \* Have a plan of action prepared

#### MSDS REVIEW

- Identity, manufacturer phone #, emergency phone #
- \* Haz. ingredients, phys. & chem. characteristics, fire, reactivity, explosion data
- \* Occupational health, PEL,TWA, STEL routes of entry, first aid, PPE
- \* Storage, spills and disposal info.

19

#### GENERAL WASTE HANDLING PRACTICES

- \* GROUNDING during handling and storage of flammables
- \* Work with a Buddy whenever poss.
- \* Protect yourself with PPE
- \* Know what you are working with
- \* Never mix wastes
- \* Do Not handle unknown materials

20

## MOVING WASTE

- \* Thoroughly inspect container / lids
- \* Don Your PPE
- \* Secure container for movement
- \* Move to PRE-SELECTED area
- \* Reinspect container
- \* Check labels so they face outward

21

## PERSONAL PROTECTION EQUIPMENT

At minimum, during waste handling employees will use the following PPE:

- \* Goggles, Face Shields, and Gloves
- \* Chemical Apron or Coveralls
- \* Protective Shoes
- \* Appropriate Respirator (If Needed)

22

#### EFFECTIVE USE OF PPE

- \* Define All Hazards Involved
- \* Understand the Routes of Entry
- \* Watch for Signs of Over-Exposure
- \* Care for and Maintain PPE
- \* Locate Emergency Showers, Eyewash Stations, and First Aid Kits
- \* Be ALERT to break-through

23

## FOUR ROUTES OF ENTRY INTO THE HUMAN BODY

- \* Inhalation-- nose and lungs
- \* Ingestion-- mouth, throat, and stomach
- Permeation-- through skin and mucous membrane, and eyes
- \* Puncturing-- into tissue (less common)

#### TWO TYPES OF EXPOSURE

- \* <u>Chronic</u>-- Repeated exposure, lower dose, not necessarily less danger
- Acute-- Sudden exposure, higher doses, more likely to have serious illness or death

PPE helps reduce exposure and control health risks. Use it!

25

#### **DEFINITION OF A SPILL**

- \* SMALL SPILL- less than 10 gallons, in immediate area, w/ known material
- \* LARGE SPILL- more than 10 less than 55 gallons. Must call AS! Incident Rpt.
- \* SPILL EMERGENCY- anything over 55 gallons. Must call AS! EC may call for outside assistance. Incident Report.

26

#### SPILL CONTROL PROCEDURES

- \* Isolate area, get other employees out
- Call AS with location, chemical, quantity, request medical assistance
- \* Collect spill tools and PPE, don PPE
- Implement spill control/clean-up
- Put wastes in containers
- Transport waste for storage, date/label

27

# SPILL CONTROL TOOLS AND SUPPLIES

- \* SPILL CABINETS- in process areas
- Contain- absorbent products, drain covers, non-spark shovel, gloves etc...
- Other Non-sparking tools from AS
- \* LEL/Oxygen meter from EH & S Mgr.
- Need to notify AS or EH & S Mgr. if spill supplies run low

28

## WHO MAY CLEAN-UP A CHEMICAL/WASTE SPILL?

- The following employees are allowed:
- \* Pressman, Pressman Assistant
- \* Helpers
- \* Rolltenders
- \* Pre-make Ready

**EMERGENCY PROCEDURES** 

- \* Employee Contacts Area Supervisor
- Area Supervisor Contacts Plant Manager/Emergency Coordinator
- \* Plant Manager/EC decides course of action, to call 911 etc...
- \* EC may call on Plant Emergency Organization to assist in emergency

30

-7

#### Emergency Procedures Cont.

- \* Know signals and evacuation routes (they are posted near exits/doorways)
- \* Evacuate when signaled and go to your assembly point-- take roll call
- \* Stay in evacuation area
- \* No employee shall leave assembly area, unless permission from AS/EC

#### In An Emergency Remember

- \* Don't take on more than you're trained
- \* Communicate with others and superv.
- \* Use your PPE
- \* Be accounted for at roll call
- \* Know emergency plans and signals
- \* Think before you act

#### After The Emergency

- \* Assure area is safety to re-enter
- \* Re-stock or decon. used equipment
- \* File incident/accident report
- \* EC will send reports to gov't agencies
- \* Implement any needed changes to operating practices, to avoid future incidents.

#### **Universal Waste Procedures** Used Fluorescent lamps

TheEPA regulates fluorescent lamps as Universal Waste. The following procedures must be followed when lighting and disposing of sport littersecent lamps. This regulation applies to Fluorescent, High-pressure Southm, Mercury Vapor, and Metal Halled lamps.

BURED LAMPS

Adequate to prevent breakage of spent lamps.

Labeling
"Used Lamps" or "Wasto Lamps" or "Universal Waste - Lamps."

#### include the start date that the first spent tube was placed in the container

Disposal
DO NOT put fluorescent lamps in the waste dumpster. Store them in the designated container.
(GREEN-ENDED TUBES ARE OK TO PLACE IN THE DUMPSTER)

Accumulate spent lamps for up to one year, and then send them to a recycler. (Spent lamps cannot be stored for longer than one year.)

#### Response to Breakage Immediately and SAFELY place broken lamps into a closed container

Training
Be sure you have been trained about the proper handling, management and emergency procedures
related to used fluorescent lamps.
34



State of Ohio Environmental Protection Agency

Smurfit Stor

#### Southwest District Office

401 East Fifth Street Dayton, Ohio 45402-2911 TELE: (937) 285-6357 FAX: (937) 285-6249

Bob Taft, Governor Maureen O'Connor, Lt. Governor Christopher Jones, Director

April 24, 2002

Lonnie Grayson Smurfit Stone, Di-na-cal Label Group 4500 Beech Street Cincinnati, Ohio 45212

Dear Mr. Grayson:

This is a follow up letter to the notice of violation sent on April 19, 2002. The generator identification number for the facility is OHD056487101. The facility is currently operating as a large quantity generator.

#### **Return to Compliance**

During the inspection on April 10, 2002, I noted a violation of OAC 3745-65-16(C) which requires employees to take part in an annual review of the initial training.

On April 19, 2002, our office received from you a copy of the recent training and attendees. After our telephone conversation today, it was determined that Smurfit Stone Di-Na-Cal Label Group has now returned to compliance with OAC 3745-65-16(C).

All other violations that had been noted during the inspection were addressed during the inspection on April 10, 2002.

Thanks for your immediate response to these issues. If you have any questions or comments, please contact me at 937-285-6080.

Sincerely.

Debora Depweg

Division of Hazardous Waste Management

Ohio EPA

CC:

Tammy McConnell, CO

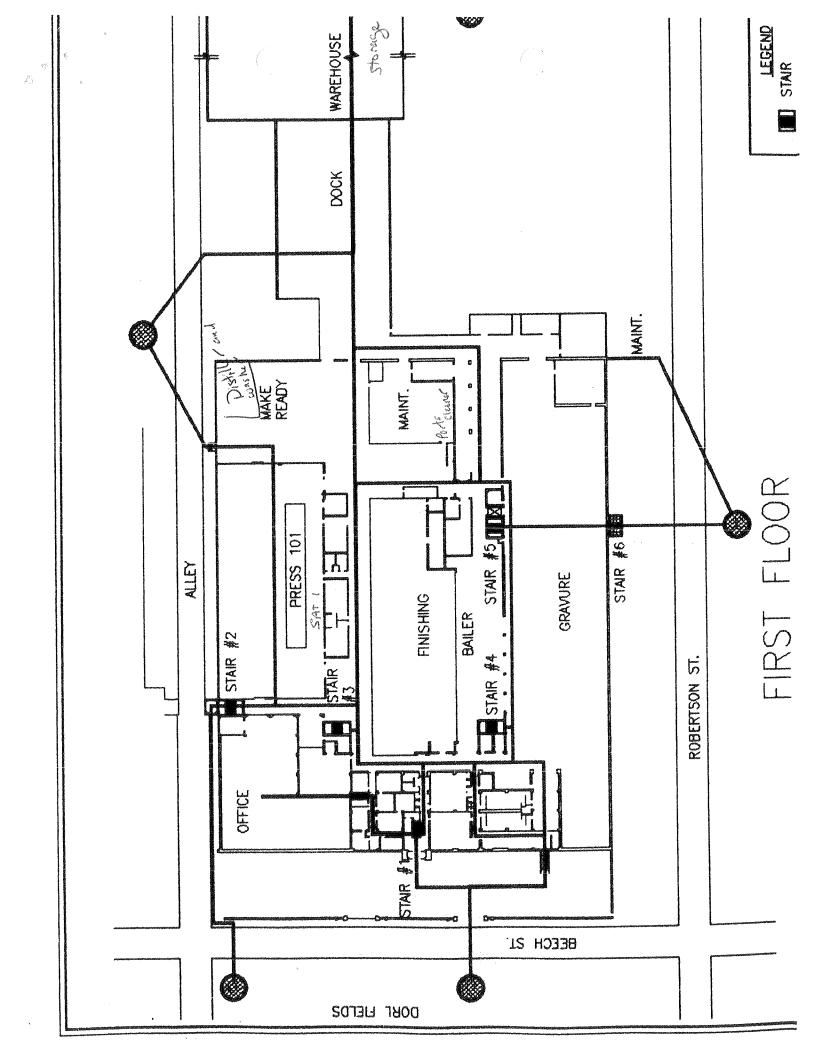
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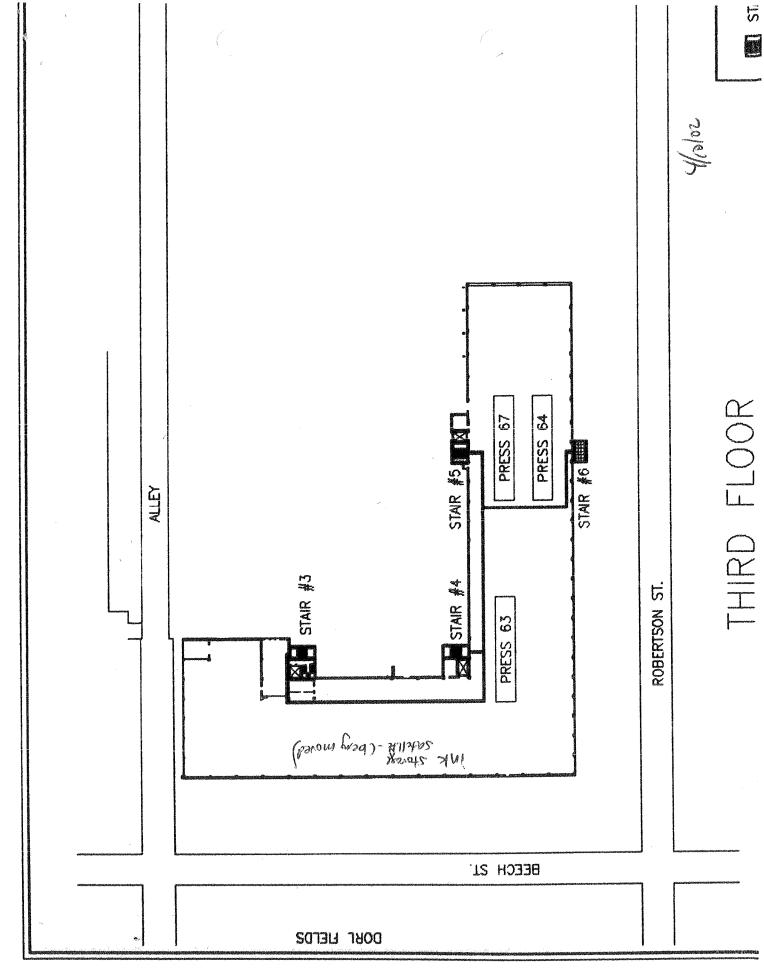
#### NOTICE:

Ohio EPA's failure to list specific deficiencies or violations in this letter does not relieve your company from having to comply with all applicable regulations.

Di Ne Cay & Concount &

	EPA ID#: 0HD05648710/	Off-Site Management	Name, state, and type of activity occurring at the facility.	Petro chem processing Lyeastle?	Nagar T-q		Peclaimud Enersy, Cornner ville IN	•	Sath Keen Hebra OH
PROCESS DESCRIPTION/WASTE ACTIVITIES SUMMARY	CESQG/TSD	ement	Waste Location (Include map if possible)						4
TE ACTIVIT	Facility Type(Lag/sag/CESag/TSD	On-Site Management	Type of On- Site Treatment (recycle, wwt, etc)					(echime	har waste
PTIONWAS			Type of Accumulation/ Storage (e.g. container, tank, etc)	arums.	\$ 7	of rums.	Olrems	e Z	tota ~ 27 Iram month
S DESCRI	Di-Na-CA COPE		QTY Generated per Month	p				Assistant and the second and the sec	
ROCES			EPA Waste Code	20 35. 20 35. 70 05.	100 000 100 00	Sem	\(\frac{2}{2} \frac{1}{2} \fra		\$ 7
P	Smurfit Stone	Description of Waste	Waste Generated (e.g. sludge, spent	solvent paint white	paint elips solids spent solvent	3 4 2 4 2 4 4 4 4 4 4 4 4 4 4 4 4 4 4 4	U.Seed	spent solvent	
	Facility Name: $\lesssim_{r}$	Desc	Process/Activity Generating Waste (e.g. plating bath, machining, baghouse, painting, etc)	1 George Granum Cleaning	2 Machin clening	3 general process opention	4 oil separater From	53 +570	mate Cent





# Ashland Distribution Company WASTE PROFILE

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Technical Conta	act:	Lonnie Grayson			2854	Springboro West	
Phone:		(513) 396-5627		****	_Mora	ine, OH 45439	······································
Fax:		(513) 396-5615	ge, coliferante en la compactación de metro de la composição en composição de la composição de la composição d	мерино			
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MEK	<u> </u>		3-5%	Toluene & Ethyl A	cetate	and the second s	2-4%
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D005	Barium		>100.0	***************************************	D025	p-Cresol		0
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D020	Chlordane		>0.03		D040	Trichloroethylene		**************************************
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D022	Chloroform		>6.0		D042	2,4,6 -Trichlorophenol		
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# Ashland Distribution Company WASTE PROFILE

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Source Code A	·			pmanne		
				Che	ck here if this is a	recertification
		GENERAL IN	FORMATION			
			Generator USEP	A ID#:	OHD 056 487 10	01
Generator Name:	Dinagraphics					
Generator Address:	Beech and Robertson	1				
	Cincinnati, Ohio 4521	2	_ Billing Address:	ASHL	AND DISTRIBUT	TON COMPANY
Technical Contact:	Lonnie Grayson		name.	2854	Springboro West	
Phone:	(513) 396-5627		<del></del>	Mora	ine, OH 45439	and the state of t
Fax:	(513) 396-5615		and the same of th			
Ashland Sales Rep:	Bernie Bissmeyer		Billing Contact:	_Donn	a Kondrath	
Phone:	937-298-2818	Charles On The Mall Hold Household and Arter discount from the Arter of State of State of State of State of St	_ Phone:	937-2	298-2818	marakat kana ing sakatan na hindun na hindunga Khanilaan na na marakat kana na mata ma
Fax:	937-298-5759		Fax:	937-2	298-5759	
	•	PROPERTIES ANI	D COMPOSITION		entre de la companya	
Process Generating Wa	aste: Cleanup of Pres	s Units				
	e Solvent Sludge			****	<del>kalan maga panta da kalang kalan makili da pang aga panja kalang panta kalang pa</del>	
	lous waste(40CFR Part	261) 2 Yes ⊠	No 🗌	Wast	ewater  Non-	wastewater 🕅
	ted and characteristic wa					Masicalater M
TOCHUIT TILL OOLI TI 1100	Ca and Grandonning we	anc code numbers	State Waste (			
Physical State @ 70 °F	: Solid Liquid	Both⊠ Sinc	le Layer ☐ Multilay			· 65 to 100 %
	10.0 OR N/A					
***************************************				······································		
Liquid Flash Point 3</td <td>°F 🗌 73-99°F 🖾 100-</td> <td>139°F 🔝 140-199</td> <td>°F</td> <td>N/A L</td> <td>Closed Cup ⊠</td> <td>Open Cup</td>	°F 🗌 73-99°F 🖾 100-	139°F 🔝 140-199	°F	N/A L	Closed Cup ⊠	Open Cup
	TION: List ALL constitue			orward a	available analysis.	
Constituents		Range/Units	Constituents			Range/Units
MEK		40-50%	Ethyl Alcohol			20-25%
Hexane		3-5%	Toluene			5-10%
Propyl Acetate		5-10%	Aliphatic Hydrocar	bons		5-10%
Ethyl Acetate		5-10%	Propyl Alcohol			1-2%
Propylene Glycol		1-5%	Methyl Alcohol			0-1%
TOTAL COMPOSITION N	NUST EQUAL OR EXCEE	0 100%		***************************************	Analytical da	ta attached
As and any order of the first o		SHIPPING IN	FORMATION			***************************************
Dealeraines Dulle Cal	امال المساعدة			J	Others	
Packaging: Bulk Sol			Type/Size: 55 q c			оничности подписателения подражения подписателения предписателения подписателения
Anticipated volume:	300-400	en flansk flansk flansk for en en flansk flansk Flansk flansk	Shipping Freque	ency: _	quarterly	
		SAMPLING IN	IFORMATION			
Is a sample required?	YES NO			MSDS	attached	
Date Sampled:	Ремострукту стана qu-финалоги установа принага принага на принага на принага на принага на принага на принага п В принага на принага принага принага на принага	Sampler's Na	me/Company:		nordinatesylk voor variansen on kangeade seje overliken, het greep hij kanada singst begann se	tarayan ku a qaray 18 maa ahaa ahaa ahaa ahaa ahaa ahaa ahaa
Generator's Agent Sup	ervising Sampling:				der de dans de la descripción de la calción	aanutuumian yootituusa mooni utuvii tiimpustii qiimaan eesaa ka faa faa faa
Agenting to a graph and a grap	ОТН	IER HAZARDOUS	CHARACTERISTICS	3	and a suppression of the suppres	ngungungki khamasa mga dada si gamanin sa hijahipagin biga gamana a gam
Specific Gravity: Ra	ange: <u>.78</u> to <u>.94</u>	OR Actual	UHC pre	esent F		
	HAP Waste?: ☐ YES		BTU Value (per pour			⊠ >5,000

GENER	ATOR'S WASTE MATI	ERIAL	PROFILE	SHEET (C	ONTINUED)	ASH <u>05-5</u>	713	######################################	·
CONTA	MINANTS: [ TO	CLP	_ C TO	] JATC	NONE IN T	ofile # THIS SECTION PRESENT			
		REGU	JLATORY	•			REGU	LATORY	
EPA#	<u>NAME</u>	1	EVEL	<u>ACTUAL</u>	EPA#	NAME	L	<u>EVEL</u>	<u>ACTUAL</u>
D004	Arsenic		>5.0		D024	m-Cresol		>200.0	
D005	Barium	$\boxtimes$	>100.0		D025	p-Cresol		>200.0	
D006	Cadmium		>1.0		D026	Cresol (total)		>200.0	
D007	Chromium		>5.0		D027	1,4-Dichlorobenzene		>7.5	
B000	Lead		>5.0		D028	1,2-Dichloroethane		>0.5	
D009	Mercury		>0.2		D029	1,1-Dichloroethylene		>0.7	de la
D010	Selenium		>1.0		D030	2,4-Dinitrotoluene		>.13	
D011	Silver		>5.0		D031	Heptachlor		>0.008	· · · · · · · · · · · · · · · · · · ·
D012	Endrin		>0.02	tananako tarantu irraka ir	D032	Hexachlorobenzene		>0.13	
D013	Lindane		>0.4	yearlymycature anciente entrephycustature non e-nort entre	D033	Hexachloro-1,3-butadiene		>0.5	
D014	Methoxychlor		>10.0	***************************************	D034	Hexachloroethane		>3.0	***************************************
D015	Toxaphene		>0.5	~ <del>~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~</del>	D035	Methyl ethyl ketone	$\boxtimes$	>200.0	***************************************
D016	2,4-D		>10.0		D036	Nitrobenzene		>2.0	
D017	2,4,5-TP (Silvex)		>1.0		D037	Pentachlorophenol		>100.0	C
D018	Benzene		>0.5	engeleiningen voluntarin verbieter verbert.	D038	Pyridine		>5.0	Mindelplan (** - minderschierbefreiber Defenservertrossen
D019	Carbon tetrachloride		>0.5	**************************************	D039	Tetrachloroethylene		>0.7	· · · · · · · · · · · · · · · · · · ·
D020	Chlordane		>0.03		D040	Trichloroethylene		>0.5	
D021	Chlorobenzene		>100.0	***************************************	D041	2,4,5 -Trichlorophenol		>400.0	
D022	Chloroform	П	>6.0		D042	2,4,6 -Trichlorophenol	$\Box$	>2.0	
D023	o-Cresol		>200.0		D043	Vinyl chloride		>0.2	
	TO CONTRACT OF THE PROPERTY OF	~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~	T	RANSPORT	ATION INFO	RMATION	cyala dyyanyan cyaladd dadd	Polygolicza Sitradja til podposnikowania oceania oceany	Tourist the my print and continue to the systematic by the service
le thie a	DOT Hazardous Materi	al?	⊠ Y€		No				
			-	ை <u>mmable Liq</u>					
	Toluene and MEK ))		. 100.0	11 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1		h i i i i i i i i i i i i i i i i i i i	<del></del>	و به در بالا الدون المالية الم	a, a ayan ayaa ahay gara taa garan sarah sarah sarah sarah yarah saya yarah sarah
Hazard				I.D.#	t: <u>UN1993</u>	Packing (	Group:	11	
Addition	al Description:D00	1 D03	5 F003	F005 D005					
CERCL	A Reportable Quantity	_	100		RQ Units (I	lb/kg): <u>lbs</u>	_ E	RG#	
SPECIA	L HANDLING:	an <del>a ang pantapiana ang pa</del> n	area and the state of the state		castinas di molarandino mosso is mai madi cad ni gita di dimendin par	and the state of t			······································
dandersida sembrado está está está está está está está está		arangangan kangdi sibus na sawaran	over herendossensen versen stedensen paar de progressen v	wasto piloti in the first and first and the second		Addit	ional P	age(s) Att	ached L
				GENERATO	R'S CERTIF	ICATION			
						ments contains true and ac			
						I - Appendix I or by using a			
reievan	r to obtain a sample from	many i	or suspec waste shir	ted nazarus oment for bu	in the posses irposes of rec	ssion of the generator has be ertification. If the waste stre	een or eam or	process o	authorize senerating
the was	te changes, I will notify	Ashlan	d Distribu	tion Co. prio	r to shipment	of the waste.			
1	acourt of smor	r-613	orac .		•			2/12/	7.3
Signatu	re	gr.		Printed	(or typed) na	ron Medy/anv. Englar me and title	Da Da	<i>///                                  </i>	Lamente de la composition della composition dell
•		·haot·	l authoris	a Achland D	ictribution Co	. to act as my agent to mak	a corre	ctione to t	his profile
						haracterization and/or regu			
	eral agencies. I unders								TIAL:

# Ashland Distribution Company WASTE PROFILE

SIC Code					ASH	05-6038	
Form Code	В	ocknownia macentalism confirm our rith excellence de					
Source Code	Α						
					Che	eck here if this is a	recertification
			GENERAL	INFORMATION			
				Generator USEP	A ID#:	OHD 056 487 10	1
Generator Name	e:	Dinagraphics					
Generator Addre	ess:	Beech and Robertso	on	reprodukting manusum			
		Cincinnati, Ohio 452	12	Billing Address:	ASHI	AND DISTRIBUTI	ON COMPAN
<b>Technical</b> Conta	act:	Lonnie Grayson		andronous graps	2854	Springboro West	
Phone:		(513) 396-5627			_Mora	ine, OH 45439	
Fax:		(513) 396-5615					
Ashland Sales	Rep:	Bernie Bissmeyer		Billing Contact:	_Donn	a Kondrath	
Phone:		937-298-2818		Phone:	937-2	298-2818	
Fax:		937-298-5759		Fax:	937-2	298-5759	
	**************************************		DDODEDTIES A	ND COMPOSITION		· · · · · · · · · · · · · · · · · · ·	
			PROPERTIES	ND COMPOSITION			
Process Genera	ating Wa	aste: <u>Cleanup</u>	ند د د د د د د د د د د د د د د د د د د				
Waste Name:	_Wast	e Absorbent Pigs					
Is this a USEPA	hazaro	lous waste(40CFR Part	261)? Yes	⊠ No □	Waste	ewater Non-v	vastewater 🔯
Identify ALL US	EPA list	ted and characteristic v	aste code numb	ers: _D001 D035 D0			
				State Waste C			
Physical State (	გე 70 °F	: Solid ⊠ Liquid □	I Roth □ S	ingle Layer  Multilaye		THE RESERVE OF THE PARTY OF THE	n to n
		- Maria de la companya del la companya de la compan		Describe solvent/oil	*******		
Liquid Flash Poi	int <73	°F⊠ 73-99°F□ 100	-139°F ☐ 140-1	99°F	N/A 🗌	Closed Cup ⊠	Open Cup [
CHEMICAL CO	MPOSI	TION: List ALL constitu	uents present in	any concentration and fo	orward a	available analysis.	
Constituent			Range/Units	Constituents			Range/Units
Absorbent F	<sup>o</sup> lgs		95-98%				-
Aromatic Di	stillates		0-3%	where the residence are residence as any discovering and relative transport and transp		kan maranan kan garan hali da	**************************************
Oils			0-3%		<del></del>	are with remertable research ned equation magnetic errors	
Aliphatic Dis	stillates		0-3%		*****************	recovered to the contract of t	
					national designation and recognitive and		
TOTAL COMPOS	SITION R	IUST EQUAL OR EXCEE	ED 100%	•		Analytical dat	a attached _
With Ages Statement about \$100 All Control Con		endrogradiona violatoro e a densità in consumptingo con competing qua anche in consumina de la consumina del c	SHIPPING	INFORMATION	Renewent-sendegoversal-warenovers		<u> </u>
Packaging: E	Bulk Sol	id 🗌 💮 Bulk Liqui			deries	Othor	
		<del></del>					
Anticipated vo	iume.	3 drums		Shipping Freque	ency: _	quarreny	
			SAMPLING	INFORMATION			
Is a sample req	uired?	YES 🗌 N	10 🛛		MSDS	attached	
Date Sampled:			Sampler's	Name/Company:		<u> </u>	
· ·	ent Sup	ervising Sampling:					
All and a state of the state of		OT	HER HAZARDOI	US CHARACTERISTICS	3		унородин моуктарыны унограциялын байасын байын төрөө <del>сөзгөөгөн</del>
Chariffa Consider	, D.			I UHC pre		7	
ODECHIC CISIVILY	. K	anue. 1.23 (0 1.	ro on mulua		escill i	j.	

Is this a Benzene NESHAP Waste?: ☐ YES ☑ NO

4/10/02

CONTAI	M!NANTS:	TCLP	\ 	OTAL [	- NONE IN	rofile # THIS SECTION PRESENT		
			JLATOR				COULATODY	
EPA#	NAME		EVEL	ACTUAL	EPA#	NAME	REGULATORY LEVEL	ACTUAL
D004	Arsenic		>5.0	EQUIPE OF SHIPLION SOUR CHINA SOUR	D024	m-Cresol	>200.0	
D005	Barium	$\boxtimes$	>100.0	***************************************	D025	p-Cresol	☐ >200.0	Marketperstellers and transfer to project any organization and improve
D006	Cadmium		>1.0		D026	Cresol (total)	□ >200.0	
D007	Chromium		>5.0		D027	1,4-Dichlorobenzene		
B000	Lead		>5.0	***************************************	D028	1,2-Dichloroethane	□ >0.5	
D009	Mercury		>0.2	***************************************	D029	1,1-Dichloroethylene	□ >0.7	
D010	Selenium		>1.0	***************************************	D030	2,4-Dinitrotoluene	☐ >.13	
D011	Silver		>5.0		D031	Heptachlor	☐ >0.008	
D012	Endrin		>0.02		D032	Hexachlorobenzene	☐ >0.13	Quit- 1 in Hardmann sandharanga ann agus an ann
D013	Lindane		>0.4	atelescopie and the later to th	D033	Hexachloro-1,3-butadiene	□ >0.5	——————————————————————————————————————
D014	Methoxychlor		>10.0		D034	Hexachloroethane	 □ >3.0	***************************************
D015	Toxaphene		>0.5		D035	Methyl ethyl ketone		
D016	2,4-D		>10.0	**************************************	D036	Nitrobenzene	☐ >2.0	
D017	2,4,5-TP (Silvex)		>1.0	Charles - 100 and resembly control of the Angelon and	D037	Pentachlorophenol	☐ >100.0	#NePforth/tolicis-serviceschiana/kranthyzugedannya
D018	Benzene	. 🗆	>0.5		D038	Pyridine	□ >5.0	
D019	Carbon tetrachloric	le 🔲	>0.5		D039	Tetrachloroethylene	□ >0.7	
D020	Chlordane		>0.03	· · · · · · · · · · · · · · · · · · ·		Trichloroethylene	□ >0.5	· · · · · · · · · · · · · · · · · · ·
D021	Chlorobenzene		>100.0		D041	2,4,5 -Trichlorophenol	☐ >400.0	
D022	Chloroform		>6.0	Activities and the control of the co	D042	2,4,6 -Trichlorophenol	☐ >2.0	
D023	o-Cresol		>200.0		D043	Vinyl chloride	>0.2	
<del>colorium aditi mana</del> aaaaaaaaaaaaaaaaaa	and a particular statistic space to the Confession state of a region with quantum adjust a ring of which which we will	- two left flights have explored and the experience as a single	T	RANSPORT	ATION INFO	PRMATION		**************************************
Is this a	DOT Hazardous Ma	terial?	⊠ Y	es 🗌	No	•		
Proper S	Shipping Name:	R.Q. \		ammable Sol	ids, N.O.S.			
_(_	Aromatic and Aliph	atic Petro	oleum Di	stillates )				
Hazard (			President de l'annual de l	I.D.#	#: <u>UN1325</u>	Packing G	roup: II	
				F003 F005	a Production of the State of the Control of the Con			**************************************
	A Reportable Quantit L HANDLING:	.v _	100		RQ Units (	lb/kg): <u>lbs</u>	ERG#	***************************************
SPECIA	L HANDLING.	framero e e e en france e en france de elementario e e e e e e e e e e e e e e e e e e e	**************************************	del introducement communication and parameter communication is a second communication of the		Additio	onal Page(s) Att	ached [
***************************************		ON OF CONTRACT CONTRA		GENERATO	R'S CERTIF			
1		amatan menerala						• • •
						ments contains true and acc 1 - Appendix I or by using an		
relevant	information regarding	ig known d	or suspec	ted hazards	in the posses	ssion of the generator has be	en disclosed. I	authorize
disposer	to obtain a sample t	from any v	vaste shi	pment for pu	rposes of rec	ertification. If the waste stre	am or process g	enerating
uic wast	e changes, I will not		SMUTA	audit Co. pilo	Contract	Of the waste.  Mech/ENU. ENG		
	-e (:)	Lagran			DNNIE C	GRAYS Un	07/	17/2000
Signatur	e ·			Printed	(or typed) na	me and title	Date	
Authoriz	ation to conect profi	le sheet.	i autimiz	e Asiriand D	istribution Co	o io aci as my ageni io make	conections to t	i iis profile
sin <del>cc</del> i, s	ach conedions bein	ເຊ ບຸນກະເສໄຊ	ail willi (i	ine sampie pr	esented for c	ສຳສາສບໄຕກ່ຂອງເບົາ ສາເປ່/ບາ ກອນປ່ອ	iuy requiremen	iis of state ΤΙΔΙ

ASH 05-6038

GENERATOR'S WASTE MATERIAL PROFILE SHEET (CONTINUED)

4/0/02

#### (2/96)

# Ashland Distribution Company WASTE PROFILE

SIC Code						ASH	05-6365	·
Form Code	В	etermikantsuleh disempin di kacamatan situ di suppresya						
Source Code	Α						to represent the second of the	y y paganan na mangan di pindapan da manan da minan da mahan pangan bagan sa bagan sa bagan sa bagan sa bagan s
						Che	eck here if this is a	recertification
				GENERAL IN	FORMATION			
					Generator USEP	A ID#:	OHD 056 487 10	1
Generator Name	э:	Dinagraphics	<del>Laborator (Arata i ra ra r</del> a	er til skyler menne skriver prokstyre fler fler en de til freskrivet beskrivet beskrivet beskrivet beskrivet b			entroferon storacon promotivo recognistico que en ricola considera contrato en reconocio en forma en esta esta En esta esta esta en entropo en entroferon que que en ricola considera contrato en entro en en entro en esta e	
Generator Addre	ess:	Beech and Ro	bertson	waa ayaa ayaa ayaa ayaa ayaa ayaa ayaa	Marrocka			
		Cincinnati, Oh	io 4521	2	Billing Address:	ASHL	AND DISTRIBUT	ION COMPANY
<b>Technical Conta</b>	ict:	Lonnie Gravso	on		ada kowandow	2854	Springboro West	**************************************
Phone:		(513) 396-562	7	on the west to demand the specific and specific and southern the specific as a specifi		Mora	ine, OH 45439	
Fax:		(513) 396-561	5	<del>iii aliquay yayaliid hadyaaniii oo aasaa aa aa</del>	deres vicas			
Ashland Sales	Rep:	Bemie Bissme	eyer		Billing Contact:	Donn	a Kondrath	
Phone:		937-298-2818			Phone:		298-2818	
Fax:		937-298-5759	ayaan aan qaadaa ah qaasaa ah q		Fax:	937-2	298-5759	
этфотфинальфинального проблему дационной — этобым обнования	<del></del>	remit monte des sobilemente procurencian quant de se el escape especifició de la mente enclar	P	ROPERTIES AN	D COMPOSITION			ig veld graft ender mit it stig veld mit en op fan de trom de graft de trom de tres de tres en om an
Process General	tina W:	este: PM on F						
Waste Name:			AMIDITIE	II.		*************		
	costate descriptions	And the Company of th	D Dort 1	261\2 Vaa [	] No ⊠	Mask	overton [7] bloom	···ntarrates 🔯
				ste code number				
Idelitiiy ALL US		eu anu characte	iisuc wa	ste code number	Service of the servic		annagringsverklemen meg es a brokker mår ve kondeljen är et utbrokktivåtegrafteren syndst	
Dhyminal Chala (	> 70 °C	CalialTillia	:	2-4-17 0:-				
					gle Laver 🛛 Multilave			_98_to _100 \
pH: Range	to	OR N	VA⊠ S	Strong odor	Describe	***********	Color <u>dark</u>	and a state of the same of
Liquid Flash Poi	nt <73°	°F 🗌 73-99°F 🗀	] 100-1	39°F 🔲 140-199	o°F	N/A 🗌	Closed Cup 🛛	Open Cup
CHEMICAL CO	MPOSI	ΓΙΟΝ: List ALL o	onstitue	ents present in ar	ny concentration and fo	nward a	vailable analysis	
Constituent		I I WILL I KNOW OF A COURSE OF		Range/Units		riai a	andoro di laiyoto.	Range/Units
Oil				100%				
	***************************************	<del>Valentina et es services en el conserva en el conserva de la conserva de la conserva de la conserva de la cons</del>	<del>andidistrakturaturaturialani</del> a	monto deporto de la que como culier conservo escopentra que que política do per		-	adór a platimo de coment popo a deprende pode pode plos de sep el popo a más popisa il cospolacio po	
disperial of the grant science out any strength assumed a global probabilism and the second of the s	oplyst joich orgists about mine, so		termennen figså forspråven brightigar	phonesia managapapan produka da masa managama mada m		***************************************	<u>татря Амания статра статра в ченей не общенення в не общенення в не общенення в не общенення в не общенення в</u>	***************************************
энник метер (пред на пред на	<del>aan kan</del> defan ee <del>dear</del> op op op om toe oor de		***************************************		makendeksen konstyren internen med ekstyret av attenen interne og melysvare spanten internet kan bestå kan kyn	and statement of the st	and for dampine, we show to we would want pulpe push the manifest weight between	decental experiency adversaring unique regue description in the study of square quality and the study of the
		Programme All Republished the grant of lead with the promote transport and grant are the characteristic grant produced in			Meaning the committee of the company		ndigriete zamporanis godine vetopor y prace zamenno i postogo postopo e ristem procesio.	
TOTAL COMPOS	ITION N	IUST EQUAL OR	EXCEED	100%		Day kan kan Time Grands yang di mining Sariah badan	Analytical dat	a attached
		entejárnák vendernányvag ve márnákégu vilomálya namentejárá ássennelyátág mengib égenyv	<del></del>	SHIPPING IN	FORMATION	indromony dy models y disciplin	isiliyin meydi nironiyanin harabiy dasaa ijiya qiyanbiya marabi sayu asaa marana, qasaqhis mushaqqi	errer ar eftir y arreje egyment errer handy pelesty y omner pennenny ag meg vely eft y jorder eftir egy meg vel
Packaging: F	Rulk Sol	id□ Bulk	Liquid	☐ Drum [X]	Type/Size: 55 g d	irum	Other	
Anticipated vol							guarterly	
Vincharea AN	uiiic.	174 QIQIIIS		in dipolar de manimismo per inferimenta per promonenta professor de mesa militar que espetimente e Professor de mentre de la professor de mesa per professor de la professor d	Simpling Fledue	HIGY	<u>quarterry</u>	egen a designe en plesse en
				SAMPLING IN	IFORMATION			
Is a sample requ	uired?	YES 🗆	NO			MSDS	attached	
Date Sampled:	<b>CONTRACTOR OF THE PARTY OF THE</b>	motivatilization processory for expectation of which consequences were because the consequence of the consequences of the cons	ntologya o monophic processoreston	Sampler's Na	ame/Company:	and the state of t		
Generator's Age	ent Sup	ervising Sampling	q:     .	and harmonic control of the grant of the state of the sta	de kelepandi indigelegi periokasa kendigi kelepi pelakun belankungak denikan pengandi sebasa sepikan besaran	andansanige geterakulayara	roundescrib sylvation for message in more than the state of the state	eknorooosismasynnassaksismassaksissastassataasatassatajassataksisytäkkisisytäyteestyteeskinkyky
			ОТН	ER HAZARDOUS	CHARACTERISTICS	i.	n na marayan di digan naga mana managa na bisan na sa da	- agreementarist in fragistique quantity plus to account of the contract of th
Specific Gravity	Ra	ange: .78 to	85	OR Actual	UHC pre	sent [	1	
					BTU Value (per pour			<b>⊠</b> >5.000

BTU Value (per pound): ☐ <5,000 OR ☒ >5,000

GENER	ATOR'S WASTE MAT	ERIAL	PPOFILE	SHEET (C	ONTINUED)	ASH <u>05-6</u>	365	<del>y was and the state of the sta</del>	ffetekmeknissis ossi assityyintiint aysi tirkkendonyong missaas
CONTA	MINANTS:	CLP	T	DTAL [	NONEIN	rofile # THIS SECTION PRESENT			
		REGU	JLATORY	•			REGUL	ATORY	
EPA#	NAME	Į.	<u>EVEL</u>	<u>ACTUAL</u>	EPA#	NAME	LE	VEL	<u>ACTUAL</u>
D004	Arsenic		>5.0		D024	m-Cresol		>200.0	
D005	Barium		>100.0	<del>dana - 1944 </del>	D025	p-Cresol		>200.0	and the state of the same of t
D006	Cadmium		>1.0	<del>and a local and an angular policy and the second and a s</del>	D026	Cresol (total)		>200.0	
D007	Chromium		>5.0	The state of the s	D027	1,4-Dichlorobenzene		>7.5	Consideration consumption in the design of the second
B000	Lead		>5.0	<del>leder i is die de state en gles an system gang ang an gift a anang</del>	D028	1,2-Dichloroethane		>0.5	der der der der der er er der der der de
D009	Mercury		>0.2	<del>ang ang disely a transition in the energy in the asymptotic recomposed way drop</del>	D029	1,1-Dichloroethylene		>0.7	terment in growth in the stip helds growing my money language and ge
D010	Selenium		>1.0	algorium restructură de surre con septemp qui basequi escriți	D030	2,4-Dinitrotoluene		>.13	germanismis againthiongimeire mahain quitous
D011	Silver		>5.0	glat berkenn kommuning kommynte stangarpmyngstak turn	D031	Heptachlor		>0.008	erroprincherrolensen op steptement and tribology et autjack group answer
D012	Endrin		>0.02	The winds to the species of the state of the species of the specie	D032	Hexachlorobenzene		>0.13	ng 18 fysik den mei stereges fra den serven er kommen er serven
D013	Lindane	- 🔲	>0.4	<del>all-Surviva personal system algorithment fler underkompresse del</del> que	D033	Hexachloro-1,3-butadiene		>0.5	<del>y nit yn y mei nit mae'n dael fan laethaef y de aet eu ne</del> gou
D014	Methoxychlor		>10.0	akus sagan Talapan mangan	D034	Hexachloroethane		>3.0	grátisetentegenett eszánszásszásszenniszássáságás <sub>szás</sub> szásszássás
D015	Toxaphene		>0.5	ernetennerspeyerusynner <del>jah yldysynskynskynskynsy</del> gleyb	D035	Methyl ethyl ketone		>200.0	<del>ariana ny faritamina dia dia dia pampa dia manampia</del>
D016	2,4-D		>10.0	<del>10.30.30.00.00.00.00.00.00.00.00.00.00</del>	D036	Nitrobenzene		>2.0	marrolpostostostostostostostostostostostostosto
D017	2,4,5-TP (Silvex)		>1.0	<del>Nantouriem bristorio bester si muu rilar mii dun</del> a	D037	Pentachlorophenol		>100.0	repartience phisosophica and demonstrates and any demonstrate phisosophica and agreement and any and any any a
D018	Benzene		>0.5	<del>(gjórða eg til þess mind með stærna þess ag se</del>	D038	Pyridine		>5.0	ángazanya dimuseka mádili mádindindigi þeddiganski sesses endreða apens
D019	Carbon tetrachloride		>0.5	······	D039	Tetrachloroethylene		>0.7	nation or desired productive for the productive of the desired productive communications and the second productive communications are also as a second productive communication of the second productive communications are also as a second productive communication of the second productive comm
D020	Chlordane		>0.03	ек ( ж. б.	D040	Trichloroethylene		>0.5	especimilarity approximate account of the second account of the
D021	Chlorobenzene		>100.0	<del>lagis kahi denga midandipota yakazo kapitandapanana</del>	D041	2,4,5 -Trichlorophenol		>400.0	tion many distribution of the state of the s
D022	Chloroform		>6.0	wales and the second of the se	_ D042	2,4,6 -Trichlorophenol		>2.0	typesylven mymilita tantana arasan ata baran arasan arabata ar
D023	o-Cresol		>200.0		D043	Vinyl chloride		>0.2	
man oraș oraș de li forme de la companya de la comp	kennen kanna k	in the second construction with the second co	TI	RANSPORT	ATION INFO	RMATION	on the state of th		mynt of his day and a contract of the contract
Is this a	DOT Hazardous Mater	ial?	☐ Ye	s 🛛	No				
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dispose		m any v Ashland	vaste ship I Distribut	ment for purion Co. prio	rposes of rec	ertification. If the waste street of the waste.			
Signatu	nui (° f			LONN	* -	SRAYSUN	Date	7/00)	1/2000
Authoriz	ation to correct profile :	consiste	ent with th	e Ashland D e sample pr	istribution Co.	. to act as my agent to mak haracterization and/or regul	e correc	tions to t quiremer	

# AUGUST 20TH-26TH

	LIRS! SECUND	PRESS 101	R. KNEPPER B. WALLEY	C. CHADWELL G. STEVENS	Y. PATTERSON R. WOODRUM	D. WALTERS	AKE READY TEAMS	D. BYRD C. ROGERS	D. MILLS C. GROHS	B. REYNOLDS D. HUTCHINSON	L. MCWILLIAMS T. ROLFES	Finishing	FIRST SECOND	Slitting		J. LIEBERT B. OGDEN		Inspectors	CWILLIAMS	J. ANDERSON F. WOSTER			D. BURWICK T. ROGERS	7	R. WAGNER	S. BURTON,			EXTRA; S. FREEMAN T. WALKER				
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101	5		CREW LEADER	ASST. CREW LDR.	CREW MEMBER	CREW MEMBER		¥	CYLINDERS	PMR UTILITY	ASSEMBLER				201	202	203		301	302	303	5004	SHIP/PACKER	PORTER	SHIPPING	MAINTENANCE	VACATION GRAVURE		SICK		ATIONS	LAY OFF	

MAIN TOPIC: Supervisor Training- RCRA, Confined Space
OTHER TOPIC: Review of the written programs

Date: 10/12-10/13 2000

Anderson	Jenny
Ashorn	Robert
Ballman	Brian
Baker	Robert
Bauer	Gary
Binkley	Donna
Blevins	Philip
Borgemenke	Daniel
Borgemenke	Neal
Brown	Tamara
Burwick	Daniel
Byrd	Danny
Campbell	Leonard
Chadwell	Connie
Coffey	Steven Stem Coffe
Conley	Scott
Conner	Lanna Lanna Conner
Cook	Dallas
Cooper	Douglas
Cooper	Floyd
Cooper	Jerry
Cooper	Philip
Crump	Chryll
Cunningham	John
Downey	Robert
Edrington	Wanda
Ense .	Bruce



Ferguson	James
Flischel	Michael
Foley	Michael
Freeman	Susan
Frey	John
Fuller	Kenneth
Grayson	Lonnie
Grohs	Carl
Hagaman	Steven
Harper	Donna
Harper	Robert
Haverland	Sharon
Herbe	Dave
Hines	Donald
Hipp	Steven
Hutchinson	David
James	Randy Judd N- James
Jones	Fred (/
Jones	William
Kessler	Leonard
Kimble	Gregory
Kirn	Mark Mark Jun
Kisker	Dave
Knepper Jr.	Richard
Kuykendall	Jeffrey
Laflin	William
Lerman	Rick Carparel Comment
Liebert	John
Martin	Leslie
Mattson	Patricia
McCall	Michael
McGuire	John
МсКоу	Butch B. Milosy
McWilliams	Marnike Marnike
McWilliams	Luther

Mills	Daniel
Mourer	Bill
Myrick	Michael
Ogden	William
Oligee	Tom
Painter	J.Dave
Patrick	Charles
Patterson	Yvonne
Patton	Carolyn
Reynolds	Oscar
Reynolds	William
Ritchey	Sharon
Rogers	Carl
Rogers	Teresa
Rolfes	Thomas
Ruggles	June
Ryan	Ralph
Scott	Jackie
Shanks	Andre
Skiba	Terry
Sorrell	Ronald
Spivey	Bill Biel Spream
Stevens	George
Sunderhaus	Andrew
Swisher	Jim
Thompson	Jim from Thompson (Ing)
Thurmond	Rodney
Timmerman	Brett
Van Bever	Mo
Vaughn	Jim
Von Hagel	Tom
Wade	Harold
Wagner	Robert
Wainscott	Sandy Sandia K. Wainscott
Wainscott	Wallace



Walker	James
Wall	Robert
Walley	William
Walters	Daniel
Wiehoff	Gregory
Wilcox	John
Williams	Cynthia
Wilson	Bill
Wood	Benjamin
Woodrum	Ron
Woster	Fatima
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# MAIN TOPIC: Hazardous Communication, Right To Know OTHER TOPIC: RCRA & Florescent Tube handling

Date:05/11-12/00

Thomas on 05/11-1400.

Ashorn  Ballman  Bauer  Gary  Binkley  Donna  Blevins  Philip  Borgemenke  Daniel  Borgemenke  Neal  Brown  Tamara  Tamara  Tamara  Brown  Worley  Burvick  Daniel  Leonard  Chadwell  Connie  Clouser  Wendy  Coffey  Steven  Cooper  Douglas  Cooper  Cooper  Floyd  Coper  Cooper  Philip  Fully  Formula  Formula	Anderson Francis	Jenny ,
Bauer Gary Donna Binkly  Binkley Donna Dinna Binkly  Blevins Philip Dill Blevins  Borgemenke Daniel Donna Borgemenke  Brown Tamara Jammy Burway  Brown Worley  Burwick Daniel Danny Burway  Campbell Leonard Leonard Cary held  Chadwell Connie Chadwey  Coffey Steven All Call  Conner Lanna Lanna Lanna Lanna  Cook Dallas Markay  Cooper Floyd Leonard Corpan  Cooper Floyd Leonard Corpan  Cooper Philip Mulyy James	Ashorn	Robert By Whyn
Binkley Donna Janu Blakly  Blevins Philip Jale Blevins  Borgemenke Daniel Janu Brown  Brown Tamara Jammy Brown  Brown Worley  Burwick Daniel Janu Brown  Campbell Leonard Lorrand Campbell  Chadwell Connie Chadwy  Coffey Steven  Conley Scott  Conner Lanna  Cook Dallas Janua Lanna  Cooper Douglas Park Cooper  Cooper Jerry Leing Cooper  Cooper Philip Fully January  Conner Lanna Cooper  Cooper Philip Fully January	Ballman	Brian
Blevins Philip Blankman Borgemenke Daniel Again Donasmenke Brown Tamara Jammy Barry Burwick Daniel Danny Barry Campbell Leonard Leonard Campbell Clouser Wendy Coffey Steven Conley Scott Conner Lanna Lanna Lanna Cooper Cooper Floyd Longary Cooper Cooper Philip Thelyy James	Bauer	Gary Jan Bay
Borgemenke  Borgemenke  Neal  AC  Brown  Tamara  Tamara  Tamary  Burwick  Burwick  Byrd  Danny  Campbell  Leonard  Connie  Clouser  Wendy  Coffey  Steven  Conley  Scott  Conner  Lanna  Lanna  Lanna  Cooper  Douglas  Cooper  Cooper  Cooper  Philip  The lang James  Cooper  Philip  The lang James  Cooper  Philip  The lang James  Cooper  Cooper  Cooper  Philip  The lang James  Cooper  Cooper  Cooper  Philip  The lang James  Cooper  Cooper  Cooper  Cooper  Philip  The lang James  Cooper  Cooper  Cooper  Philip  The lang James  Cooper  Cooper	Binkley	Donna Linna Binkley
Borgemenke  Brown  Tamara  Jammy Brown  Brown  Worley  Burwick  Daniel  Danny  Campbell  Leonard  Connie  Chadwell  Connie  Clouser  Wendy  Coffey  Steven  Conley  Scott  Conner  Lanna  Lanna  Lanna  Lanna  Cook  Dallas  Cooper  Douglas  Cooper  Floyd  Cooper  Cooper  Philip  Philipy James	Blevins	Philip Philo-Blandings
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Brown  Burwick  Daniel  Danny  Campbell  Leonard  Connie  Chadwell  Clouser  Wendy  Coffey  Steven  Conley  Scott  Conner  Lanna  Cook  Dallas  Cooper  Douglas  Cooper  Cooper  Cooper  Cooper  Douglas  Cooper  Cooper  Douglas  Cooper  Philip  Pully Joan	Borgemenke	Neal VAC,
Burwick  Byrd  Danny  Campbell  Leonard  Connie  Chadwell  Conser  Wendy  Coffey  Steven  Conley  Conner  Lanna  Cook  Dallas  Cooper  Cooper  Cooper  Cooper  Cooper  Cooper  Cooper  Cooper  Douglas  Cooper  Cooper  Cooper  Cooper  Cooper  Derry  Cooper	Brown	Tamara Jammy Brown
Byrd Danny Composition Composition Composition Composition Composition Connie C	Brown	Worley
Campbell Leonard Leonard Coupled  Chadwell Connie (hadrou)  Clouser Wendy  Coffey Steven Chadrou  Conley Scott  Conner Lanna Lanna Lanna  Cook Dallas (ACANGO)  Cooper Douglas Party Cooper  Cooper Floyd Logger  Cooper Jerry Leily Cooper  Cooper Philip Thelipy Jagger	Burwick	Daniel Vano surwick
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Clouser Wendy  Coffey Steven  Conley Scott  Conner Lanna Lanna Canner  Cook Dallas  Cooper Douglas Cacper  Cooper Floyd Logs Cooper  Cooper Jerry Lany Coope  Cooper Philip Pulipy Jagger	Campbell	Leonard Can bell
Confey Steven  Conley Scott  Conner Lanna Lanna Canner  Cook Dallas MCANG  Cooper Douglas Park Cooper  Cooper Floyd Lorger  Cooper Jerry Lang Coope  Cooper Philip Thulyn Jagan	Chadwell	Connie C, Chadwell
Conley Scott  Conner Lanna Lanna Canuer  Cook Dallas / Corper  Cooper Douglas Park Corper  Cooper Floyd Long Corper  Cooper Jerry Lang Corpe  Cooper Philip Thuly Jagan	Clouser	Wendy
Cook Dallas Acarro  Cooper Douglas Party Cooper  Cooper Floyd Hoys Cooper  Cooper Jerry Long Cooper  Cooper Philip Puling Jagen	Coffey	Steven Steven
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Freeman PA	Susan Jan Francisco
Frey	John Man
Fuller	Kenneth fundito f Halle //
Grayson	Lonnie
Grohs	Carl 5/4 //
Hagaman	Steven State
Harper	Donna Donna J. Harper (3)
Harper	Robert 514
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Hester	- John
Hines	Donald Sonal Cine
Hipp	Steven Stave High
Hutchinson	David Danid Withertonen
James	Randy $P/B$
Jones	Fred S/L
Jones	William William for
Kessler	Leonard
Kimble	Gregory Luck C
Kirn	Mark (
Kisker	Dave
Knepper Jr.	Richard Knylyra Korgan
Kuykendall	Jeffrey If Legful System
Laboiteaux	Clifford
Laflin	William V'ACAHON
Lerman	Rick
Liebert	John Soft Lead of
Martin	Leslie Jeslie Kith Martin
Mattson	Patricia Voly Mottoo
McGuire	John John In
McKoy	Butch / S Myaw
McWilliams	Marnike Marny Mc Williams

Mills	Daniel Daniel Mills
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Naylor	David David Nex Yor
Ogden	William B. OGNEN
Oligee	Tom Ja L
Painter	J.Dave dave her
Patrick	Charles Charles L Factor
Patterson	Yvonne Offarme & Pattusas
Patton	Carolyn Patfon Cakolyn,
Pringle	Carl Retraed
Rau	Gale Retines
Reynolds	Oscar Oscar Davel
Reynolds	William William Z Monules
Ritchey	Sharon Sharon Retailey
Rogers	Carl Carl, Mayer
Rogers	Teresa LUBA ROGUS
Rolfes	Thomas in free
Rottinghaus	Charles Retired
Ruggles A	June Jan L Roge
Ryan	Ralph O Blogh Ryan
Scott	Jackie Jackie
Shanks	Andre Mari Shluth
Skiba	Terry
Snell	Charles RETIRED (Bashes Smill)
Sorrell	Ronald Tongerff DIXIII
Spivey	Bill Bell Spend
Stevens	George Long Tongky
Sunderhaus	Andrew Janes
Swisher	Jim July as J
Thompson	Jim Jan hampson
Thurmond .	Rodney Nowmone O
Van Bever	Mo M.O. Vaußeu
Von Hagel	Tom
Wade	Harold This Wade

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Wagner	Robert KolutWagner
Wainscott	Sandy Sandra K le aungeott
Wainscott	Wallace Walloce Wainscott
Walker	James JAC
Wall	Robert Gast Dalfith
Walley	William William Walley
Walters	Daniel VAC
Wiehoff	Gregory Pheggy & Wicholf
Wilcox	John 15/5
Williams	Cynthia Cludy Jilliamo
Wilson	Bill Bill Wifson
Wood	Benjamin Leu Jood A
Woodrum	Ron Por BNorder
Woster	Fatima $P/S$
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Wanda &	adrington)
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SPILL CONTROL	<del></del>			7	1.0	XI	4	*	*		*	*	**			**		1	4	8 K	1	*	N/O	1.4		1			4	40	,	40	70	X	1	SPILL CONTROL COMMENTS
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PERSONNEL, EQUIPMENT, TRAINING GROUNDING	X	OK.	YO	24	20	Al III	94	OK	OK	21	26	2K	N. A. X.	OF	26	N.	*	V -	**	**	24	70	20	Z.	X	20	70	2×	2K	2K	OK	AR.	the state of the s	0x	*10	PERSONNEL, EQUIPMENT. TRAINING GROUNDING LABEL
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DATE	5:21-21	5-189 A	10-1-	1220	1-901	1971	13301	10081	8624	9.21-01	10.46	9-10-01	7-17-OK	7-25 m	10101	10.8.01	1000	10220	23000	104	10-11	180%	0.00	100	10-69-8	2.0%	2006	Mal.	J.O.K.	4-0×	20-61	100	2016	162	189	DATE

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NATIONAL RESPONSE

AND THE

373-7880

GAN AT 1-800-292-4706 OR OUT OF STATE AT 5

EMERGENCY ALERTING SYSTEM, IN MI

**SOLLUTION** 

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a Printed/Typed Name

# WASTE MANAGEMENT DESIGN MICHIGAN DEPARTMEN DESIGN ENVIRONMENTAL QUALITY

GENERAL INSTRUCTIONS

1 DO NOT WRITE IN THIS &

item 15, The gall or Associations REJ. Document

Required under authority of Part 111 and Part 121 of Act 451, 1994, as amended.

141 partitions and another and the be-

Month Day

Fallure to file may subject you to criminal and/or civil penalties under Sections 324.11151 or 324.12116 MCL.

Form Approved. OMB No. 2050-0039 information in the shaded areas is not required by Federal law. Generator's US EPA ID No. UNIFORM HAZARDOUS Page 1 O H D Ø 5 6 4 8 7 1 lo lof ⊅e¶ **WASTE MANIFEST** 3.10 Generator's Name and Mailing Address to DINAURAPHICS. IRU A. State Manifest Document Number ATTHE LOWNIE GRAYSON SEED CINCINNATION B. State Generator's ID assigned identification numbers. Generator's Phone ( 5. In Transporter 1 Company Name maigeous appellations as a nos 6q test US EPA ID Number O State Transporter's ID ASHLAND DISTRIBUTION CO., toleson is stabled to only O 11 D 1 17470031 D. Transporter's Phone 1337 7. Transporter 2 Company Name US EPA ID Number E. State Transporter's ID following information in the shaded area is a solution. F. Transporter's Phone (1913) 1924 9. Designated Facility Name and Site Address stars betragging A US EPA ID Number - nedmin G. State Facility's ID PETRO-CHEM PROCESSING INC gned number, a státe ass e must enter a unique five digit **421 LYCASTE** H. Facility's Phone what and out washes, ender the appropriate in the TIONTION OF A of Part 111 and 40 CFR 261 Sun PISSE in the TIONTION Asset NID 9 8 6 6 1 5 2 9 8 4343) 324-386 14. Unit Wt/Vol 12. Containers 13. 11. US DOT Description (including Proper Shipping Name, Hazard Class, and Total ID NUMBER). Quantity e keste plankisle lightne, k.o.s. undere metryl ethyl ketone) 3, uni993, prii (dool D035. F003. F005. D005) 05-3713 PETRO (VF063318 ec vaste Flankable Livatus, k.o.s. GENE b. CEPATL TANK RETURE, ETHIL ALCOHOLD 3. UN1993 PGIII (D001, F003, F005, D035) 65 EG HASTE PLANKABLE BULLUS, ORGANIC, M. O. S. P. L. L. (ARONATIC DISTILLATES, ALIPRATIC DISTILLATES) ..1\_001325 PGLI (D001\_D035, D005, F003, F005) genta Additional Descriptions for Materials Listed Above Flamiliano Pade LIGH Conf. (Perg. Perg. 1985) 中国人。其他的人是否则是这些,可以这个对对对对对 d on this manifest packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste to be economically practicable and that I have selected the practicable method of freatment storage, or disposal currents and future threat to human health and the environment. OR; if I am a small quantity generator, I have made generation and select the best waste management method that is available to me and that I can afford. 17. Transporter 1 Acknowledgement of Receipt of Materials vinted/Typed Name's ₩ /<sup>ue</sup>ls Transporter 2 Acknowledgement of Receipt of Materials... Date: Signature um the plue banded copy to the gener 19. Discrepancy Indication Space vina chemil ADDRESS ALL MDEO MANIFEST COPIES TO: WASTE MANAGEMENT DIVISION MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY 20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in item 19.

Signature



#### VISION MICHIGAN DEPARTM SENVIRONMENTAL QUALITY TO DESCRIPTION OF THE PARTY.

GENERAL INSTRUCTIONS

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Required under authority of Part 111 and Part 121 of Act 451, 1994, as amended.

mi/Failure to file may subject you to any a criminal and/or civil penalties under Co. Sections 324.11151 or 324.12116 MCL.

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	16. GENERATOR'S CERTIFICATION: I hereby declare packed, marked, and labeled, and are in all respe	that the contents of this consi	gnment are fully and accusport by highway accord	urately described a	bove by proper ship ternational and nation	ping name and are clo
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	20. Facility Owner or Operator: Certification of		terials covered by this			
+	Item 19.	14 34 5 4				Date

#### LAND DISPOSAL RESTRICTION NOTIFICATION \*

Required for all Hazardous wastes identified in 40CFR Part 261 Refer to Treatment Standards in 40 /

Manifest No.

\* For wastes not meeting treatment standards or exceeding prohibition levels of 268.32 or RCRA section 3004(d)

Generator Name: <u>Dinagraphics</u>,

	Manifest Line Item No. A PreQual No	. 1110001	.8 (ASH 05-5713) NWW X WW
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# WASTE MANAGEMENT DIVISION MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY

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ATT. DIS. ATT. PR.

Required under authority of Part 111 and Part 121 of Act 451, 1994, as amended.

Failure to file may subject you to criminal and/or civil penalties under sections 324.11151 or 324.12116 MCL.

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3. Generator's Name and Mailing Address	DINAGRAPHICS, INC	DODASI	State Manifest Doc	and the second section of the section of the second section of the section of the second section of the section of th
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ATTN: LONNIE GRAYSON	CINCINNATI, OH 45212		State Generator's	
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MORTRU: INC.				ne <b>(313) 824-5846</b>
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packed, marked, and labeled, and are in all resp	ects in proper condition for transport by highly	av according to applicable	international and nat	ional government regulations.
If I am a large quantity generator, I certify to to be economically practicable and that I ha	ive selected the practicable method of treat	ment.∷storage, or disposa	l currently available	to me which minimizes the
present and future threat to human health a suggeneration and select the best waste managen	and the environment: OR: if I am a small or	uantity denerator. I have	made a good faith	effort to minimize my waste
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AT 517-373-7660 AND THE NATIONAL RESPONSE

STATE

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1-800-292-4706 OR OUT

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ALERTING SYSTEM,

MICHIGAN POLLUTION EMERGENCY DAY.

MUST BE REPORTED 1-800-424-8802 24 HOU

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WAST School MENT VISION PARTM. COF ENVIRONMENTAL QUALITY

EPA Form 8700-22 (Rev. 9/88)

	DO	NOT	WRITE	IN	THIS	ACE
ATT.	]	DIS	S. 🗆		REJ.	

Required under authority of Part 111 and Part 121 of Act 451, 1994, as amended.

Failure to file may subject you to criminal and/or civil penalties unde Sections 324.11151 or 324.12116 MCL.

PR.

Please print or type Form Approved. OMB No. 2050-0039 1. Generator's US EPA ID No. UNIFORM HAZARDOUS Manifest 2. Page 1 Information in the shaded areas Document No is not required by Federal 0 H D Ø 5 6 4 8 7 1 Ø 1 WASTE MANIFEST Generator's Name and Mailing Address DINAGHAPHICS. INC A. State Manifest Document Number 15236 BEECH & ROBERTSON ATTN: LONNIE GRAYSON **GINCINNATI, OH 45212** B. State Generator's ID 513 396-5627 Generator's Phone ( 5. Transporter 1 Company Name US EPA ID Number C. State Transporter's ID ASHLAND DISTRIBUTION CO. O H D 0 7 4 7 0 0 3 1 1 D. Transporter's Phone (937) 298-2816 7. Transporter 2 Company Name US EPA ID Number E. State Transporter's ID NORTRU INC. N I D 0 2 1 0 8 7 2 7 5 F. Transporter's Phone (313) 824-584 9. Designated Facility Name and Site Address US EPA ID Number G. State Facility's ID PETRO-CHEM PROCESSING INC **421 LYCASTE** H. Facility's Phone | N I D 9 8 0 6 1 5 2 9 8 DETROIT, NI 48214 (313) 824-5848 12. Containers 13. I. Waste 11. US DOT Description (including Proper Shipping Name, Hazard Class, and Total Unit ID NUMBER). No. Type Quantity Wt/Vo RO WASTE FLAMMABLE LIQUIDS, M.O.S. (TOLUENE, a. METHYL ETHYL KETONE) 3, UN1993, PGII (D001, X D035, P003, F005, D005) 05-3713 PETRO #WF063518 D #04180 G rg vaste flankable liquids, k.o.s. b. N E (METHYL ETHYL KETONE, ETHYL ALCOHOL) 3, UN1993, X PGIII (D001, F003, F005, D035) 05-5714 #WL63519 D 100 440 A T RU VASTE PLANNABLE SOLIDS, ORGANIC, N.O.S. c. 0 X (ARUNATIC DISTILLATES, ALIPHATIC DISTILLATES) 4.1 UNI325 PGII(D001,D035,D005.F003,F005) DROOSOO d. J. Additional Descriptions for Materials Listed Above K. Handling Code b. (EPA Cont. : F003, F005, D035) a. (EPA Cont. : D035, F003, F005, D005) c. ((EPA Cont. 10035, 0005, F003, F005) 15. Special Handling Instructions and Additional Information ENERGENCY RESPONSE CALL \*1-800-ASHLAND\* 16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR; if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Date Simple 18 1 130 mm Printed/Typed Name Signature Day, Jugo 11 James 161 17. Transporter 1 Acknowledgement of Receipt of Materials TRANSPORTER Date Printed/Typed Name\_ Signature Month Day Brentoningopynous 3171510 18. Transporter 2 Acknowledgement of Receipt of Materials Printed/Typed Name: onese bor printed contributions destablished Signature Day Month rann a si i guar comunici cunti bun'an nambaganat antig 19. Discrepancy Indication Space AUDRESS ALL MDEG MARREET COPTEU TO: on abiandi anota abn. mt WAS IF MANAGEMENT DIVISION MERHANN DEPARTMENT OF FAVERDAMENTAL DEPARTMENT Refore Values 20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19. Printed/Typed Name Signature Month Day 8MO P AllyiChinas chamainn a s

#### LAND DISPOSAL RESTRICTION NOTIFICATION \*

PreQual No. WF63518 (ASH 05-5713)

Manifest No. MI

Required for all Hazardous wastes identified in 40CFR Part 261 Refer to Treatment Standards in 40 (

\* For wastes not meeting treatment standards or exceeding prohibition levels of 268.32 or RCRA section 3004(d)

Generator Name: <u>Dinagraphics</u>, Inc

Manifest Line Item No.

Mercury Wastewaters All

EPA Waste Code(s) & Subcategories: D001 High TOC	Ignitabl	e Characteristic Liquids,D035,F003,
Attachment 1 - EPA Waste Code Listing is being sub	mitted with th	is notification unless listed above
Waste Constituent Notification(s):		to from cauch unless listed above.
Attachment 2 - Waste Constituent Notification is being		
Addition 2 Waste Constituent Modification is Delin	g submitted w	ith this notification unless listed above.
Manifest Line Item No. B PreQual No.		1
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Attachment 1 - EPA Waste Code Listing is being sub-	mitted with thi	s notification unless isted above.
Waste Constituent Notification(s):	***************************************	
Attachment 2 - Waste Constituent Notification is being	g submitted w	nth this notification unless listed above.
Manifest Line Item No C PreQual No	<u>WF0747</u>	71 (ASH 05-6038) NWW X WW
EPA Waste Code(s) & Subcategories: D001 High TOC I F003.F005	gnitable	Characteristic Liquids, D035, D005,
Attachment 1 - EPA Waste Code Listing is being subn	nitted with this	s notification unless listed above.
Waste Constituent Notification(s):		
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The state of the s	3delinica m	ar and notification driess listed above.
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Attachment 2 - Waste Constituent Notification is being	Submitted wit	in this notification unless listed above.
ATEGORIES are required for: D001, D002, D003, D006	6, D008, D0	09, F025, K006, K069, K071, K106, P047, U151, U
High TOC Ignitable Characteristic Liquids	K006	Anhydrous Chrome Oxide Pigment WW Treatment Sluce
Ignitable Characteristic Wastes		Hydrated Chrome Oxide Pigment WW Treatment Slucge
All corrosives. managed in non-CWA systems	K069	Calcium Suifate (Low Lead)
All corrosives, managed in CWA systems		Non-Calcium Sulfate (High Lead)
Reactive Sulfides or Reactive Cyanides	K071	RMERC Residues
Water Reactives or Other Reactives	milanticative control	Non-REMERC Residues
Cadmium Containing Batteries or Cadmium Characteristic Wastes	THE RESIDENCE OF THE PERSON NAMED IN COLUMN 2 IN COLUM	K071 Wastewaters
Lead Acid Batteries or Lead Characteristic Wastes	K106	High Mercury Non Wastewaters >260 mg/kg total Mercur
High Mercury - Organic or Inorganic	-	RMERC Residues Non Wastewaters <260 mg/kg total Me
Light Ends Subcategory		Other K106 Nonwastewaters <260 mg/kg not RMERC res
Spent Filters/Aids and Desiccants	P. A C	K106 Wastewaters
High Mercury NWWs >260 mg/kg Total Mercury	P047	4,6 Dinitro-o-Cresol or 4,6 Dinitro-o-Cresol Salts
Low Mercury NWWs <260 TM & RMERC Residue	U240	2.4 - D

WASTE CONSTITUENT NOTIFICATION is required for: D001 (other than liquid >10% TOC, if not combusted), D002,D003R-

2.4 - D Sarts and esters

D003OR, D003RS, D003WR, D004-D043, F001-F005, F039

## MAIN TOPIC: Resource Conservation Recovery Act, Intergrated Contingency Re-o 6 NA

OTHER TOPIC:

John

Frey

DI-NA-CAL Label Group Norwood Plant certifies that the following signed employees have received Hazardous

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DATE:08/09-10/01	_
Anderson	Jenny Jenny Anderson
Ashorn	Robert
Baker	Robert
Ballman	Brian
Bauer	Gary
Binkley	Donna
Blevins	Philip
Borgemenke	Daniel Hancel Borgemenke
Brown	Tamara 0 0 0
Burton	Samuel Swy Swylcs
Burwick	Daniel Van Sulwak
Byrd	Danny
Campbell	Leonard
Chadwell	Connie
Check	Carolyn
Coffcy	Steven Stin Soft
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Conley	Scott Scott
Conner	Lanna
Cook #	Dallas Joles Col
Cook	Melanie
Cooper	Douglas
Cooper	Floyd Logo Cooper
Cooper	Jerry
Cooper	Philip They Coop
Crotty	Lisa
Crump	Chryll ('Myll Crumpo
Cunningham	John )
Dennis	Marty
Downey	Robert
Edrington	Wanda
Ense	Bruce
Ferguson	James J. Flightery
Flischel	Michael Michael Allegall
Foley	Michael Muchael Wood
Freeman	Susan lug fleenger

Y 11	74.
Fuller	Kenneth
Gaffney	John
Glaser	Marilynn
Grayson	Lonnie Chat, OcalO
Grohs	Carl CARL GRONS
Hagaman	Steven
Harper	Donna NOTIMU J. Harper (3)
Haverland	Sharon
Herbe	Dave Dave Habe
Higgs	Tina
Hines	Donald
Hipp	Steven
Hutchinson	David
Jacobs	Glenn
Jones	Fred
Kessler	Leonard
Kimble	Gregory Man Kamb (,
Kirn	Mark
Kisker	Dave ()) / /
Knepper Jr.	Richard Konteal Man
Kuykendall	Jeffrey
Laflin	William & Land
Lerman	Rick
Liebert	John
Martin	Leslie
Mattson	Patricia
McCulley	Diana
McGuire	John
McKoy	Butch
McWilliams	Marnike mounikl mcu) illiams
McWilliams *	Mr. W. III.
Mills	Daniel Danny Mills
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Myrick	Michael
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Patrick	Charles
Patterson	Yvonne
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	William WID MW
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Rolfes	Thomas
Ruggles	June June
Scott	Jackie Jacque Dest
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Shanks	Andre
Skiba	Terry
Spivey	Bill Leong Stevens
Stevens	George
Stockwell	Amie //
Sunderhaus	Andrew Holy Live for
Swisher	Jim
Throckmorton	Larry
Thurmond	Rodney
Urlage	Judy
Van Bever	Мо
Von Hagel	Tom
Voorhees	Don
Wade	Harold
Wagner	Robert
Wainscott	Sandy \
Walker	James James Malpen
Wall	Debby
Wall	Robert
Walley	William Josephan Wally
Walters	Daniel Jan Wallett
Wiehoff	Gregory Meg Weetoff
Wilcox	John John Willey
Williams	Cynthia (/
Wood	Benjamin A
Woodrum	Ron KM Short 3
Woster	Fatima Jathina Casta
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# Schedule April 8th-14th

	SECOND		WALLEY-12	G. STEVENS	G. WIEHOFF	M. MYRICK		BORGENMENKE	K. FULLER	P. COOPER	G. BAUER		WALKER	C. GROHS	D-HINES Cundrana	M. FOLEY	T. ROLFES		SECOND		R. BAKER	B. OGDEN		F. WOSTER	J. RUGGLES		S. FREEMAN	J. CUNNINGHAM	C. PALION			
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	THIRD		WALLEY-12-KNEPPER	D. COOPER	D. BURWICK	L. CAMPBELL						PRE-MAKE	D. COOK	and the control of th	M. FLISCHEL	B. ASHORN	A. SHANKS (EXTRA)		THIRD		J.LIEBERT	P. WADE		D. HARPER			HAVERLAND	J. SMITH	I. BHOWN	COLSON, PAINTER		
	101		CREW LEADER	ASST. CREW LDR.	CREW MEMBER	CREW MEMBER		PRESSMAN	ASST. PRESSMAN	HELPER	ROLLTENDER		X	CYLINDERS	PMR UTILITY	ASSEMBLER 1ST	ASSEMBLER 3RD				SR71	FLOATER OTHER SLITTERS		301	302	303	SHIP/PER PACKER	PACKER	TOR ER	MAINTENANCE	VACATION GRAVURE	VACATION FINISHING



State of Ohio Environmental Protection Agency

Smurtit Diracal

#### Southwest District Office

401 East Fifth Street Dayton, Ohio 45402-2911

TELE: (937) 285-6357 FAX: (937) 285-6249

Bob Taft, Governor Maureen O'Connor, Lt. Governor Christopher Jones, Director

April 19, 2002

Mr. Lonnie Grayson Smurfit Stone, Di-na-cal Label Group 4500 Beech Street Cincinnati, Ohio 45212

Dear Mr. Grayson:

Thank you for accompanying me during Ohio EPA's April 10, 2002, inspection of Smurfit-Stone, Di-na-cal Label Group at 4500 Beech Street in Cincinnati, Ohio. The generator identification number is OHD056487101.

Ohio EPA inspected the facility to determine its compliance with Ohio's hazardous waste laws as found in Chapter 3734 of the Ohio Revised Code (ORC) and Chapter 3745 of the Ohio Administrative Code (OAC). This letter will explain the violations we found, what you need to do to correct the violations, other general concerns we have, what you need to do to respond to our general concerns and the pollution prevention opportunities we discussed. Enclosed for your records is a copy of a completed inspection checklist.

#### **Background**

The facility prints labels for heat transfer application. Smurfit Stone, Di-na-cal Label Group, uses solvents in cleanup processes and generates waste ink in the operations. These processes generate the majority of your hazardous waste. An oil separator is also utilized, and used oil is taken off-site.

#### **Violations**

The following violations of Ohio's hazardous waste laws were identified:

#### 1. Management of containers

OAC 3745-66-73 (A) requires that the containers always be closed during storage, except when it is necessary to add or remove waste.

During the inspection, the filter drum on the first floor satellite area was open without a lid. A second drum in that area did not have the bung rim properly closed. As such, Smurfit Stone, Di-na-cal Label Group, was in violation of OAC 3745-66-(A).

Upon discovery of the drums during my inspection, employees were notified and the drums were then closed. As such, your facility returned to compliance with this requirement.

Mr. Lonnie Grayson Smurfit Stone, Di-na-cal Label Group Page 2

#### 2. Annual review of personnel training

According to OAC 3745-65-16(C), employees must take part in an annual review of the initial training.

Although you do have a program on RCRA training, documentation of the past training revealed that some key personnel handling hazardous waste had not been given an annual refresher. Specifically, during my inspection I found that David Hutchinson was one of the key hazardous waste personnel in 2001, and he had not attended the refresher course. Therefore, Smurfit Stone, Di-na-cal Label Group is in violation of the annual review requirement stated in OAC 3745-65-16(C).

To return to compliance, Smurfit Stone, Di-na-cal Label Group must ensure that an annual review of the initial training is given to employees. You stated that training was to commence April 11-12, 2002. Fax or send a copy of the roster for the training and a work schedule roster for the current set up crew for your facility by April 30, 2002.

#### 3. Hazardous waste storage weekly inspections

According to OAC 3745-66-74, the owner or operator shall inspect the facility on a weekly basis for leaks and deterioration. The owner shall keep a log or summary of these inspections.

Smurfit Stone, Di-na-cal Label Group, did have a log showing weekly inspections of the storage areas. However, according to the log summary of the inspections, inspections were missed during June 11 - June 30 and the weeks of August 13 and August 28, 2001. Therefore, Smurfit Stone, Di-na-cal Label Group was in violation OAC 3745-66-74 during that time period.

Smurfit Stone, Di-na-cal Label Group has already returned to compliance on this issue as documentation of current ongoing inspections was available for the facility.

#### **General Concerns**

Your facility was not in compliance with OAC 3745-65-16 at the time of the inspection. Since shifts and responsibilities at the facility change frequently, it would be beneficial for your company to establish a way for anyone who is eligible for the shift which handles hazardous waste to attend the annual refresher training. You could also establish the training as a requirement prior to switching shifts. As a reminder, the initial training must be completed in six months for a new hire or someone in a new position in order to comply with OAC 3745-65-16 (B).

As you reported, your facility was not in compliance of OAC 3745-66-74 during several weeks in 2001 because Mr. Lerman had acquired additional job duties at that time which prevented him from performing the inspections. It is suggested that someone be assigned as a back up for conducting inspections so that the task is covered each week.

Mr. Lonnie Grayson Smurfit Stone, Di-na-cal Label Group Page 3

During the inspection, we discussed recent regulation changes. I have enclosed two sections in particular that we had discussed. There is no longer a regulatory requirement to include waste codes on the manifests at the time of shipment, per OAC 3745-54-20 (A). Although it is not a specific requirement in the regulations, Ohio EPA suggests that the waste codes still be included on waste manifests. Also, in regard to land disposal restrictions(LDR), OAC 3745-270-07(A)(3)(a) states a one-time written notice is required. Therefore, it is not necessary to include an LDR form with each shipment. One is needed if a new waste stream is created.

#### Pollution prevention

We did discuss the concept of pollution prevention during the inspection. Newer equipment installed on the first floor allows for more precise application of the inks and laquer which will reduce the amount of materials used and wasted. Changes in the equipment have also allowed for less ink to be left at the end of a run. By working with the ink suppliers using new computer programs as you intend to do, the amount of ink reworked may also be improved.

Smurfit Stone, Di-na-cal Label Group purchased a distiller approximately five years ago. This reduced the amount of solvent that was sent out for disposal. Metal pails have been emptied and crushed prior to recycling. Continual changes have allowed your company to work toward waste reduction. Your company has gathered a work team to specifically evaluate new opportunities to become more efficient in your operations. Ohio EPA encourages you to continue to investigate and follow through when applicable on pollution prevention projects.

If you have questions or comments after reviewing this letter and the supplemental information we provided, please contact me at 937-285-6080.

Sincerely.

Debora Depweg

Division of Hazardous Waste Management

**Enclosures** 

CC:

Tammy McConnell, CO

File

DD/sm

#### NOTICE:

Ohio EPA's failure to list specific deficiencies or violations in this letter does not relieve your company from having to comply with all applicable regulations.

#### RCRA HAZARDOUS WASTE GENERATOR **INSPECTION CHECKLIST**

Company:	Smurtif- Stone, Dinagal L	abel Group	PEPA ID#	: <u>OHDOS</u>	6 487101
Street:	4500 Beech St.	<i>y</i>	City:	Nonwood	OH/Cincin
County:	Hamilton		State: C	Ohio Zip: 4	5212-0000
Mailing Address:	(If different from above)		- Selection of the sele		
Telephone:	513-396-5627	Fax #: _	5/3	.396.5	615
Owner/ Operator:	Smarfit Stonz (If different from above)	and the second s	49-00-00-00-00-00-00-00-00-00-00-00-00-00		
Street:			-		
City:			State: O	hio Zip:	
Inspection Date	e(s): April 10,2002		Time(s):	10:37	1 Am to 200 pm
Inspection Anne	ounced?YesNO If so, h	ow much advar	nce notice	given?N	12
Inspectors:		offiliation Ohio EPA		elephone 137-285-6	030
Facility Representative	Lonnie Grayson Division David Kisker, flan Art. Skiba, Gener	+ Manager		513-	396-5627
Complete All	Other Applicable Checklists				
	Generator Classification		Waste N	fanagement A	ctivity
Condi	tionally Exempt SQG (CESQG)	Contai	iners		
Small	Quantity Generator (SQG)	Tank(s	s)		
Large	Quantity Generator (LQG)	Land [	Disposal F	Requirements (	LDR)
No Ge	eneration	Used (	Oil		
		Univer	sal Waste		
		Other			

CESQG:< 100 Kg. (approximately 25-30 gallons) of waste in a calendar month

Between 100 and 1,000 Kg. (about 25 to under 300 gallons) of waste in a calendar month SQG:

LQG: >1,000 Kg. (~300 gallons) of waste in a calendar month or > 1 Kg. of acutely hazardous waste in a calendar month NOTE: To convert from gallons to pounds: Amount in gallons x Specific Gravity x 8.345 = Amounts in pounds

#### **POLLUTION PREVENTION**

Note to the Inspector: This checklist has been developed to help the division in gathering general information about the pollution prevention (P2) practices that the company may have initiated or attempted to initiate. The checklist is also used to:

- Facilitate P2 discussions:
- Identify barriers to P2;
- Define the P2 universe;
- Identify the need for future P2 initiatives;
- · Identify partnership opportunities; and
- Link companies with better P2 resources.

As a prelude to completing this checklist the inspector should use the following list of questions as a way to initiate a dialogue concerning P2:

- 1. Have you tried to reduce the volume of waste (hazardous and nonhazardous) that you generate?
- 2. What is the largest waste stream that you generate?
- 3. How important would it be to you to eliminate that waste stream?
- 4. Does your company understand the reduced regulatory burden and cost saving benefits that eliminating or reducing a waste stream can have?
- 5. Could you use better housekeeping practices to reduce the amount of waste that you generate?

If the company responds with one of the answers below, the appropriate box should be checked. If the company's response does not correspond to one of the options below, please record the answer in the space provided or in the remarks section.

provid		ains section.	
1.		npany undertaken any P2 activities to amount of hazardous waste generated?	Yes NoN/ARMK#
	A O A A A A	rhat has the company done to minimize haza A change in the <u>process</u> resulting in less was A change in the <u>product</u> resulting in less was Use of fewer and less toxic hazardous raw metter operations/improved housekeeping. On-site recycling/reuse of hazardous material Sending waste off-site for recycling/reuse. Other activities (specify):	ste. ste. naterials.
	.0	hat hazardous wastes have been addressed Solvents Paint related wastes	1?

		Contaminated oils/hydraulic fluids Off-spec chemicals Fluorescent light bulbs Used batteries Shop rags				
C.	If not,	why hasn't the company considered P2?				
	00000	The company just never thought about it Lack of information about practical alternatives Lack of capital to make process changes Lack of internal management support The company does not generate enough hazar Other reason given (specify):	dous waste to consider P2			
		ompany plan to do P2 activities in the	YesNo N/ARMK#			
Wo add	uld the d	company be interested in receiving nformation from Ohio EPA about P2?	YesNo N/ARMK#			
Did duri	you giv ing the i	e the company information about P2	YesNo N/ARMK#			
Wo	uld the	company like a P2 assessment?	Yes No_ N/ARMK#			
f the company would like a P2 assessment done at their facility, the inspector must give the company representative a copy of the <u>Pollution Prevention Assessments for Hazardous Waste Generators</u> document and discuss it with them.						
If the company does not want a P2 assessment, why not?  My Law & Telam of T who routinely meet assess  REMARKS						
	Doe futu Wo add duri Wo mpa	c. If not,  Does the control of the comparison o	Contaminated oils/hydraulic fluids Off-spec chemicals Fluorescent light bulbs Used batteries Shop rags Other (specify):  The company just never thought about it Lack of information about practical alternatives Lack of capital to make process changes Lack of internal management support The company does not generate enough hazar Other reason given (specify):  Does the company plan to do P2 activities in the future?  Would the company be interested in receiving additional information from Ohio EPA about P2?  Did you give the company information about P2 during the inspection?  Would the company like a P2 assessment done at their facility or representative a copy of the Pollution Prevention Asserts document and discuss it with them.			

#### LARGE QUANTITY GENERATOR REQUIREMENTS

#### **GENERAL REQUIREMENTS**

1.	Hav	ve all wastes generated at the facility been adequately	Yes <u>√</u> No □ N/ARMK#
•		luated? [3745-52-11]	
2.	Has [37	s the generator obtained an identification number? 45-52-12]	Yes / No I N/ARMK#
3.	We Ma	re annual reports filed with Ohio EPA on or before rch 1 <sup>st</sup> ? [3745-52-41]	Yes No Z N/ARMK#_1
WASTE	IMP	ORT/EXPORT REQUIREMENTS	
4.	Doe so:	es the generator import or export hazardous waste? If	YesNo_/ N/ARMK#
	a.	Has the generator notified U.S. EPA of export/import activity? [3745-52-53]	Yes <u>✓</u> No □ N/ARMK#
	b.	Has the generator complied with special manifest requirements? [3745-52-54]	Yes No N/A RMK#
	C.	For manifests that have not been returned to the generator: has an exception report been filed? [3745-52-55]	Yes ✓ No □ N/ARMK#
	d.	Has an annual report been submitted to U.S. EPA? [3745-52-56]	Yes _/_ No □ N/ARMK#
	e.	Are export related documents being maintained on-site? [3745-52-57]	Yes / No  N/ARMK#
GENER/	OTA	R CLOSURE REQUIREMENTS	
5.	Has unit	the generator closed any <90-day accumulation (s) since the date of the last inspection? If so:	Yes No_VN/ARMK#
	a.	Describe the unit(s) which the generator has closed.	
	b.	Does closure appear to have met the closure performance standard of 3745-66-11? [3745-52-34(A)(1)]	Yes No □ N/A ∠RMK#

c. Please provide a description of the documentation provided by the generator to demonstrate that closure was completed in accordance with the closure performance standards.

NOTE: If the generator has closed a <90-day tank, closure must also be completed in accordance with OAC 3745-66-97 (except for paragraph C of this rule). [3745-52-34]

**REMARKS** 

O Awating electronic Submitted Via software

#### **MANIFEST REQUIREMENTS**

You must start this part of the inspection by telling the company representative about the certification statement on the hazardous waste manifest using the following question and statement:

Are	you aware of what the statement that you sign on the manifest	says? Yes_/_No
lf the ar	swer is no, show them what the statement says using a signed	manifest.
NOTE:	While the statement is a certification that a P2 strategy is does not establish any legal obligations with which the c words, there is no violation of the hazardous waste rules don't have a program in place.	ompany must comply. In other
1.	Have all hazardous wastes shipped off-site been accompanied by a manifest? (U.S. EPA Form 8700-22) [3745-52-20(A)]	Yes ✓ No □ N/ARMK#
2.	Have items (1) through (20) of each manifest been completed? [3745-52-20(A)]	Yes No N/A RMK#
NOTE:	U.S. EPA Form 8700-22(A) (the continuation form) may be 22. In these situations items (21) through (35) must also	e needed in addition to Form 8700- be completed. [3745-52-20(A)]
3.	Does each manifest designate at least one permitted disposal facility? [3745-52-20(B)]	Yes No □ N/ARMK#
NOTE:	The generator may designate on the manifest one alterna event of an emergency which prevents the delivery of wa facility. [3745-52-20(C)]	te facility to handle the waste in the ste to the primary designated
4.	Since the date of the last inspection, has the transporter been unable to deliver a shipment of hazardous waste to the designated facility? If so:	YesNo_VN/ARMK#
	a. Did the generator designate an alternate TSD facility or give the transporter instructions to return the waste? [3745-52-20(D)]	Yes Mo □ N/ARMK#
5.	Have the manifests been signed by the generator and initial transporter? [3745-52-23(A)(1)(2)]	Yes No □ N/A RMK#
5.	Has the generator received a return copy of each completed manifest within 35 days of being accepted by the transporter? If not:	YesNo N/ARMK#
	a. Did the generator contact the transporter and/or TSD facility to check on the status of the waste? [3745-52-42(A)]	Yes No D N/ARMK#

b. If the manifest was not received within 45 days, did	Yes No □ N/A ∠RMK#
[3745-52-42(A)(2)]	
Are signed copies of all manifests and any exception reports being retained for at least three years? [3745-52-40]	Yes
	the generator file an exception report with Ohio EPA? [3745-52-42(A)(2)]  Are signed copies of all manifests and any exception reports being retained for at least three years? [3745-52-

**REMARKS** 

#### PERSONNEL TRAINING

1.	Does the generator keep records required by 3745-65-16(D) including:						
	a.	Job titles, as they relate to hazardous waste management, and the name of each employee filling each job?	Yes ✓ No □ N/ARMK#_	de Maria de Caración de Ca			
	b.	Job descriptions, including requisite skill, education, or other qualifications, and duties of facility personnel assigned to each position?	YesNo □ N/ARMK#_				
	C.	Type and amount of both introductory and continuing training to be given to each person filling a position?	Yes ∠No □ N/ARMK#	pueses			
	d.	Documentation that personnel have completed the training or job experience required under 3745-65-16(A)(B) & (C)?	Yes ☑ No □ N/ARMK#_				
NOTE:	ab ar	the facility's business practices precludes written job ble to identify, by name, all personnel who are involved nd the training/experience that they receive initially and nn be used to document that all necessary employees i	l with hazardous waste manageme d annually. Item 9 on the next pag	ent.			
2.	tea pro imp	es the generator have a training program which ches facility personnel hazardous waste management cedures (including, but not limited to, contingency plan plementation) relevant to their positions? [3745-65-A)(2)	Yes <u>⊬</u> No □ N/ARMK#_				
3.	the abl	es the personnel training program include instruction in following areas to ensure that facility personnel are to respond effectively to emergencies by familiarizing m with: [3745-65-16(A)(3)]					
*	a.	Emergency procedures?	Yes ─ No □ N/ARMK#_				
	b.	Emergency equipment?	Yes No N/ARMK#_				
	C.	Emergency systems?	Yes No □ N/ARMK#_				
4.		es emergency training described in 3(a), (b) and (c) ove include, where applicable: [3745-65-16(A)(3)(a-f)					
	a.	Procedures for using, inspecting, repairing and replacing emergency and monitoring equipment?	Yes No N/ARMK#_				

	b.	Key parameters for auto systems?	matic waste	feed cut-off	Yes <u>₩</u> No □	N/A 💆	
	C.	Communication or alarm	system?		Yes <a>✓</a> No □	N/A <u>·</u>	_RMK#
	d.	Response procedures for	or fire/explosi	ons?	Yes <u>✓</u> No □		
	e.	Response to groundwate	er contamina	tion incidents?	Yes ✓ No 🗆	N/A	_RMK#
	f.	Shutdown procedures?	ı		Yes No 🗅	N/A 🗸	
5.	trair	ne personnel training prog ned in hazardous waste m 45-65-16(A)(2)]			Yes No 🗅	N/A	_RMK#
6.	afte	new employees receive tr er the date of hire (or assion 45-65-16(B)]			Yes No <i>i</i> ⊠	N/A	_RMK#
7.	Doe emp	es the generator provide a ployees? [3745-65-16(C)]	innual refresh	ner training to	Yes <u>✓</u> No □	N/A	_RMK#
8.	Are training records for current personnel kept until closure of the facility? [3745-65-16(E)]			Yes <u>✓</u> No □	N/A	_RMK#	
9.	thre	training records for forme e years from the date the lity? [3745-65-16(E)]			Yes No 🗆	N/A	_RMK#
10.	(write	tional: The following section of the following	te manageme ay include the sonnel who c	ent have been trained e following: environm onduct hazardous wa	d. The employee ental coordinator	es who ne	ed training nandlers.
	<u>Job</u>	Performed	Name of	f Employee		Date(s)T	rained
r.	<u>H+</u>		Den	Heldinon	MANAGEMBERS (4) TO SERVICE STREET	D-111110	
0	Ser	re job change f times did not ha	N Dome	EMARKS employen to	Le pre-ma	ki Alae	ly team
D	iðmi	times did not ha	n the to	louning His a	year.		
	Spe	exically D. Hutche	into all	min Nainey	7 ~		eri N
(D)		lan 2 defense.	Prigram	sups a staff			

#### **CONTINGENCY PLAN**

1.	Do des	es the generator have a contingency plan which scribes the following: [3745-65-52(A) through (F)]			
	a.	Actions to be taken in response to fires, explosions or any unplanned release of hazardous waste?	Yes / No 🗆	N/A	_RMK#
	b.	Arrangements/agreements with emergency authorities? [3745-65-37]	Yes <u>✓</u> No □	N/A	_RMK#
	C.	A current list of names, addresses and telephone numbers (office and home) of all persons qualified to act as emergency coordinator?	Yes <u></u> No □	N/A	_RMK#
	d.	A list of all emergency equipment, including: location, physical description and brief outline of capabilities?	Yes <u></u> No □	N/A	_RMK#
	e.	An evacuation plan for facility personnel where there is a possibility that evacuation may be necessary?	Yes No 🗆	N/A	_RMK#
NOTE:	CF. pla	he facility already has a "Spill Prevention, Control and o R Part 112 or 40 CFR Part 1510, or some other emergen n to incorporate hazardous waste management provisi h OAC requirements. [3745-65-52(B)]	cy plan, the fac	ilitv can	amend that
2.	or t	he plan designed to minimize hazards to human health he environment from fires, explosions or any planned release of hazardous waste? [3745-65-52(A)]	Yes ✓ No □	N/A	_RMK#
3.	bee req	copy of the plan (plus revisions) kept on-site and en given to all emergency authorities that may be uested to provide emergency services? [3745-65-A)(B)]	Yes No 🗆	N/A	_RMK#
4.	cha	s the generator revised the plan in response to rule inges, facility, equipment and personnel changes, ure to the plan or as required by the Director? [3745-54]	Yes <u>√</u> No □	N/A	_RMK#
EMERG	ENC	SY COORDINATOR			
5.	ls a or c	n emergency coordinator available at all times (on-site on-call)? [3745-65-55]	Yes No 🗆	N/A	_RMK#
					×*

NOTE:	The emergency coordinator shall be thoroughly familiar with: (a) all aspects of the facility's contingency plan; (b) all operations and activities at the facility; (c) the location and characteristics of waste handled; (d) the location of all records within the facility; (e) facility layout; and (f) shall have the authority to commit the resources needed to implement provisions of the contingency plan					
6.	was	s there been a fire, explosion or release of hazardous ste or hazardous waste constituents since the last pection? If so:	YesNoN/ARMK#			
	a.	Was the contingency plan implemented? [3745-65-51(B)]	Yes No □ N/A ✓RMK#			
	b.	Did the facility follow the emergency procedures in 3745-65-56(A) through (H)?	Yes No □ N/A <u>/</u> RMK#			
	C.	Did the facility submit a report to the Director within 15 days of the incident as required by 3745-65-56(J)?	Yes No □ N/ARMK#			

NOTE: OAC 3745-65-51(B) requires that the contingency plan be implemented immediately whenever there is a fire, explosion, or release of hazardous waste or hazardous waste constituents, which could threaten human health and the environment.

**REMARKS** 

PREF	AREDNESS AND PREVENTION [3745-52-34(A)(4)]	
1.	Is the facility operated to minimize the possibility of fire, explosion, or any unplanned release of hazardous waste? [3745-65-31]	Yes _☑No □ N/ARMK#
2.	Does the generator have the following equipment at the facility, if it is required due to actual hazards associated with the waste: [3745-65-32(A)(B)(C)(D)]	
	a. Internal alarm system?	Yes No □ N/ARMK#
	b. Emergency communication device?	Yes <pre>✓ No □ N/ARMK#</pre>
	c. Portable fire control, spill control and decon equipment?	Yes
	d. Water of adequate volume/pressure?	Yes ✓ No □ N/ARMK#
3.	Is emergency equipment tested (inspected) as necessary to ensure its proper operation in time of emergency? [3745-65-33]	Yes <u>✓</u> No □ N/ARMK#
4.	Are emergency equipment tests (inspections) recorded in a log or summary: [3745-65-33]	Yes ∠ No □ N/ARMK#
5.	Do personnel have immediate access to a communication device when handling hazardous waste (unless the device is not required under 3745-65-32)? [3745-65-34]	Yes ✓ No □ N/ARMK#
6.	Is adequate aisle space provided for unobstructed movement of emergency or spill control equipment? [3745-65-35]	YesNo □ N/ARMK#
7.	Has the generator attempted to familiarize emergency authorities with possible hazards and facility layout? [3745-65-37(A)]	YesNo □ N/ARMK#
	<ul> <li>Where authorities have declined to enter into arrangements/agreements, has the generator documented such a refusal? [3745-65-37(B)]</li> </ul>	Yes No □ N/A <u></u> RMK#

**REMARKS** 

#### GENERATOR ACCUMULATION

1.	<u>in e</u>	s the generator accumulated hazardous wastes on-site excess of 90 days without a permit or an extension m the director? [3745-52-34; ORC §3734.02(E)(F)]	Yes □ No.✓ N/ARMK#
SATEL	LITE	ACCUMULATION AREA REQUIREMENTS [3745-52-34(	C)(1)]
2.		es the generator ensure that satellite accumulation ea(s):	
	a.	Are at or near a point of generation?	Yes ✓ No □ N/ARMK#
	b.	Are under the control of the operator of the process generating the waste?	Yes <u>√</u> No □ N/ARMK#
	C.	Do not exceed a total of 55 gallons of hazardous waste? per stream	YesNoN/ARMK#
	d	Do not exceed one quart of acutely hazardous waste at any one time?	Yes No □ N/A ∠_RMK#
	e.	Containers are marked with the words "Hazardous Waste" <u>or</u> other words identifying the contents?	Yes ✓ No □ N/ARMK#
NOTE:	acc	e 55 gallon limit applies to the area itself, and not to eac cumulated in the area. The inspector should refer to Oi the Location of Satellite Accumulation Areas.	ch individual waste stream hio EPA's November 1994 Guidance
3.	ls t	he generator accumulating hazardous waste(s) in sess of the amounts listed in either 2(c) or 2(d)? If so:	Yes No / N/ARMK#
	a.	Did the generator comply with 3745-52-34(A) or other applicable generator requirements within three days?	Yes ∠No □ N/ARMK#
	b.	Did the generator mark the container(s) holding excess with the accumulation date when the 55 gallon (one quart) limit was exceeded?	Yes No □ N/A ✓RMK#
USE AN	ID M	ANAGEMENT OF CONTAINERS	
4.	Has "Ha	s the generator marked containers with the words zardous Waste?" [3745-52-34(A)(3)]	Yes No N/A RMK#

5.	Is t 34 <i>(</i>	he accumulation date on each container? [3745-52- (A)(2)]	YesNo D N/ARMK#
6.		e hazardous wastes stored in containers which are:	
	a.	Closed (except when adding/removing wastes)? [3745-66-73(A)]	Yes No 🖸 N/ARMK#
	b.	In good condition? [3745-66-71]	Yes <a>✓</a> No <a>□</a> N/A <a>RMK#<a></a></a>
	C.	Compatible with wastes stored in them? [3745-66-72]	Yes ✓ No □ N/ARMK#
	d.	Handled in a manner which prevents rupture/leakage? [3745-66-73(B)]	Yes
7.	[37	he container accumulation area(s) inspected weekly? 45-66-74] ( <i>Note location in general information section</i> checklist)	Yes No N/A RMK#
	a.	Are inspections recorded in a log or summary? [3745-66-74]	Yes ✓ No □ N/ARMK#
8.	For	ignitable and/or reactive hazardous waste(s):	
	a.	Are containers located at least 50 feet (15 meters) from the facility's property line? [3745-66-76]	Yes <u> </u>
	b.	Are containers stored separately from other materials which may interact with the waste in a hazardous manner? [3745-66-77(C)]	Yes <u>✓</u> No □ N/ARMK#
PRE-TR	RANS	PORT REQUIREMENTS	
9.	acc	es the generator package/label its hazardous waste in ordance with the applicable DOT regulations? [3745-30, -52-31 and -52-32(A)]	Yes <u>✓ No □ N/ARMK#</u>
10.	Doe	es each container <110 gallons have a completed ardous waste label? [3745-52-32(B)]	Yes ∠ No □ N/ARMK#
11.	or o	ore off-site transportation, does the generator placard offer the appropriate DOT placards to the initial asporter? [3745-52-33]	Yes <u>✓</u> No □ N/ARMK#
C:\WIND	Som	Temporary Internet Files\Content.IE5\0L2LQXON\LQG1.2002[1].wpd  REMARKS  week we musted dut to employee  the a additional 1st delies.	having to

RCRA HAZARDOUS WASTE GENERATOR INSPECTION CHECKLIST

#### **PROHIBITIONS**

1.		d oil being managed in a surface impoundment or pile? If so:	YesNoN/ARMK#		
	under	surface impoundment or waste pile being regulated OAC 3745-54 to 3745-57 or 3745-65 to 3745-69? 279-12(A)]	Yes No □ N/A /_RMK#		
2.	Is used 12(B)]	d oil being used as a dust suppressant? [3745-279-	Yes D No N/A RMK#_		
3.		specification used oil fuel burned for energy ery only in devices specified in 3745-279-12(C)?	Yes No □ N/ARMK#		
USED OIL GENERATOR STANDARDS					
4.		he generator mix hazardous waste with used oil provided in 3745-279-10(B)? [2745-279-21(A)]	Yes No □ N/A <u>√</u> RMK#		
5.	Does the generator of a used oil containing greater than 1,000 ppm total halogens manage the used oil as a hazardous waste unless the presumption is rebutted successfully? [3745-279-21(B)]		Yes No □ N/AŔMK#		
6.	Does the generator only store used oil in tanks, containers, or units subject to OAC 3745-54 to 3745-57 or 3745-65 to 3745-69? [3745-279-22(A)]		Yes No N/A RMK#		
7.	Are containers and aboveground tanks used to store used oil in good condition with no visible leaks? [3745-279-22(B)]		Yes No D N/ARMK#		
8.	Are containers, above ground tanks, and fill pipes used for underground tanks clearly labeled or marked "Used Oil?" [3745-279-22(C)]		Yes No No N/A RMK#		
9.		e generator, upon detection of a release of used ne the following: [3745-279-22(D)]			
	a.	Stopped the release?	Yes No □ N/ARMK#		
	b.	Contained the release?	Yes No □ N/ARMK#		
	C.	Cleaned up and properly managed the used oil and other materials?	Yes No □ N/ARMK#		
	d.	Repaired or replaced the containers or tanks prior to returning them to service, if necessary?	Yes No □ N/ARMK#		
10.	Does the generator burn used oil in used fired space  Yes_No_N/AF heaters? [3745-279-23] If so:		YesNo_/N/ARMK#		

	a.	Does the heater burn only used oil that owner/operator generates or used oil received	Yes No □ N/A <u>✓</u> RMK#
		from household do-it-yourself (DIY) used oil generators?	
	b.	Is the heater designed to have a maximum capacity of not more that 0.5 million BTU per hour?	Yes No □ N/ARMK#
	C.	Are the combustion gases from heater vented to the ambient air?	Yes No □ N/ARMK#
11.	transp genera	the generator have the used oil hauled only by orters that have obtained an EPA ID#, unless the ator qualifies for an exemption pursuant to 3745-4 (self transportation or tolling agreements)? [3745-4]	Yes ∠ No □ N/ARMK#
USED O	IL COL	LECTION CENTERS AND AGGREGATION POINTS	
12.	the ge	DIY used oil collection center in compliance with nerator standards in 3745-279-20 to 3745-279-24? 279-30]	Yes No □ N/ARMK#
13.	Is the Ohio E	non-DIY used oil collection center registered with EPA? [3745-279-31]	Yes No □ N/ARMK#
14.	genera	used oil aggregation point in compliance with the ator standards in 3745-279-20 to 3745-279-24? 279-32]	Yes No □ N/ARMK#
WASTE	EVALU	<b>JATION</b>	
15.	Have a [3745-	all wastes generated at the facility been evaluated? 52-11]	Yes No □ N/ARMK#

**REMARKS** 



## **DI-NA-CAL®** Label Group Internal Correspondence

Date:

April 11, 2002

To:

Plant wide

Location:

From:

Lonnie C. Grayson

Location:

Subject:

RCRA Training, waste handling

cc:

#### Please follow these steps when accumulating the hazardous waste.

- 1. Place the empty drum in the satellite location
- 2. Spray paint over all labels and other identification marks on the drum. This includes the red fire label with the wording "ink" on it.
- 3. Affix the hazardous waste label to the drum
- 4. Affix the red fire label with the number 3 on it to the drum
- 5. Place the lid on the drum and install the new quick release drum ring onto the drum
- 6. Attach the static grounding cable to the drum lid

#### After the drum is full of hazardous waste

- 1. Remove the temporary quick release drum ring
- 2. Install the permanent drum ring with the bolts facing downward
- 3. Check the drum over for proper labeling
- 4. Check the drum over for any potential leakage

- 5. Put the current date in the space provided on the hazardous waste label marked "accumulation date"
- 6. Within 3 days the drum of hazardous waste must be placed into the first floor hazardous waste storage room

#### When the drum is moved to the hazardous waste storage room

- 1. As you move the drum of hazardous waste storage room please make sure that the waste drum is not leaking
- 2. As you are placing the drum in the room, make sure that the hazardous waste label is facing toward the aisle way. The floor is painted so the aisles can be easily identified.

### **APPENDIX 5**

User Provided Environmental Documents





October 19, 1994

Mr. Mike Massey US Playing Card 4590 Beech St. Cincinnati, OH 45212

Dear Mike:

This letter transmitts our report of sampling conducted at your facility in Norwood Ohio on October 10, 1994.

The sampling included VOC and PCB soil samples collected from 4 areas on the plant grounds. The areas include the solvent cleaning booth, the transformer pad and surrounding soils, the drum storage pad and the location of the 3 UST's removed in 1988.

If you have any questions regarding this report, please call me at 821-0505.

Sincerely,

John J. Stirnkorb

Proactive Consulting Services

enclosure

#### EXECUTIVE SUMMARY

Proactive Consulting Services was contracted to perform soil sampling and analysis of four areas of potential soil contamination. The areas included the solvent cleaning booth, the transformer pad and surrounding soils, the drum storage pad and the location of the 3 UST's removed in 1988.

Soil samples were cored using shelby tubes driven by a GeoProbe except the transformer pad area samples which were grab samples. The collected samples were analyzed for VOC except the transformer pad samples which were analyzed for PCB. These constituents were chosen based on the potential contaminants in each area.

Analysis performed detected no VOC at either the former UST site and the former drum storage area. The solvent shed area sample was contaminated with Tetrachlorethylene (TCE). The transformer pad samples contained PCB Arochlor 1260 in concentrations ranging from 590 mg/kg to 103,000 mg/kg.

## SAMPLING PROCEDURE

Sampling was performed using a GeoProbe drill rig with shelby tube recovery of soil cores for the former UST locations, the former Hazardous Waste storage location and the solvent shed location. The transformer pad area was sampled with a trowel to collect a grab sample from the surface. Sampling equipment was decontaminated by washing with soap and water followed by a fresh water rinse. The soil samples for PCB were collected using new precleaned sampling trowels.

## Former UST Location

Three sample locations were provided by the US Playing Card (USPC) representative (see Figure 1 for sample locations). Samples locations were designated T-1, T-2 and T-3. The sample locations were within the tank pit as could be seen by a slight settlement of the material used for backfill.

Location T-1 was started and advanced to a depth of 12 feet below grade. The soil profile indicated approximately 20" of loose fill followed by approximately 10' of brown

mottled clay followed by 6" of clay and dry limestone. The core samples were checked with an HNU photoionization detector for any sign of volatile organics. None was detected. A sample from the 2-4' core was collected and placed in a precleaned jar, labeled and placed on ice for VOC analysis.

Location T-2 was started and advanced to a depth of 16 inches below grade. At this point refusal was encountered. The sampler encountered a large rock or concrete. No reading was indicated on the HNU meter and the location was abandoned. A new location was offset approximately 16" from location T-2 and designated T-2B. Refusal was encountered at approximately 16-18" in depth. The Sampler was then moved to location T-3 and refusal was encountered at 12-16". Two new locations were selected, location T-4 and T-5.

Location T-4 was started and advanced to a depth of 10 feet below grade. The soil profile indicated approximately 20" of loose fill followed by approximately 8' of brown mottled clay. The core samples were checked with an HNU photoionization detector for any sign of volatile organics. None was detected. A sample from the 2-4' core was collected and placed in a precleaned jar, labeled and placed on ice for VOC analysis.

Location T-5 was started and advanced to a depth of 6 feet below grade. The soil profile indicated approximately 20" of loose fill followed by approximately 4' of brown mottled clay. The core samples were checked with an HNU photoionization detector for any sign of volatile organics. None was detected. A sample from the 2-4' core was collected and placed in a precleaned jar, labeled and placed on ice for VOC analysis.

Table 1 shows the soil profile and HNU readings for each segment collected. The borings were not grouted at the direction of the USPC representative.

## TABLE 1 SOIL PROFILE

Segmo	ent 	Soil Type	HNU reading
T-1 T-1 T-1 T-1	0-2 feet 2-4 feet 4-6 feet 6-8 feet 8-10 feet 10-12 feet	Fill Clay/Fill Clay Clay Clay Clay Clay	0 0 0 0 0 0
T-4 $T-4$	0-2 feet	Fill	0
	2-4 feet	Clay/Fill	0
	4-6 feet	Clay	0
	6-8 feet	Clay	0
T-5	0-2 feet	Fill	0
	2-4 feet	Clay/Fill	0
	4-6 feet	Clay	0

#### Solvent Shed

Two sample locations were provided by the representative from USPC (see Figure 1 for sample locations). The sample locations were designated S-1 and S-2. These locations were in areas visibly contaminated.

Location S-1 was started and advanced to a depth of 4 feet below grade. The soil profile indicated approximately 26" of black visibly contaminated soil followed by approximately 1' of brown mottled clay. A fairly clear interface was seen for the darker soils and brown clay. No sample was collected for chemical analysis.

Location S-2 was started and advanced to a depth of 4 feet below grade. The soil profile indicated approximately 16" of black visually contaminated soil followed by approximately 2.5' of brown mottled clay. A fairly clear interface was seen for the darker soils and brown clay. A sample from the interface of the dark soil and the clay was collected and placed in a precleaned jar, labeled and placed on ice for VOC analysis. All borings were filled with dehydrated bentonite clay pellets and rehydrated with water to seal the hole.

#### Former Hazardous Waste Storage Area

Five sample locations were selected for sampling. The area was divided into four equal quadrants and a sample was taken from near the center of each quadrant. An additional sample was collected at the center of the full area (see Figure 1 for sample locations). Samples locations were designated H-1, H-2, H-3, H-4 and H-5.

The storage area was approximately 30' by 60' and was located on a former coal storage area. Approximately 6" of coal was present across the surface of the soil in this area. Core samples were collected using shelby tubes. Borings were advanced to 2 feet. The samples for analysis were collected from the coal soil interface including a portion of the coal and the top 2" of soil. During sampling no obvious visible signs of contamination were seen.

The samples were collected in glass jars and placed on ice pending analysis.

## Transformer Pad Area

Three samples were collected from the transformer pad area. Two samples were collected from surface soils and one sample was collected from a hardened tar like material on top of the concrete pad. The soil samples were numbered P-1 and P-2. The debris sample was numbered P-3.

Samples P-1 and P-2 were collected from the top 4" of soil directly adjacent to the concrete transformer pad. The samples were collected with precleaned sampling trowels placed in a glass jar, labeled and placed on ice. The tar like debris was scraped from the surface of the transformer pad directly in front of the south most transformer using the sampling trowel from sample number P-2. The sampling trowel was decontaminated with a soap and water solution and rinsed with fresh water two times prior to collection of the sample. The debris sample (P-3) appeared to be a combination of an asphalt based material and sand which was accumulated on the concrete pad near the grounding strap.

All samples were placed in a cooler with ice and transported under chain of custody to EEI laboratories. See appendix A for chain of custody documents.

#### SAMPLE ANALYSIS

The samples for the UST area, solvent shed and hazardous waste storage area were analyzed for Volatile Organic Compounds (VOC) using EPA method 8260. The transformer pad samples were analyzed for Polychlorinated Biphenyls (PCB's) using EPA method 8080. See appendix A for laboratory report.

## ANALYTICAL RESULTS

The former UST area and former hazardous waste storage area samples analyzed and found to contain no detectable levels of VOC using EPA method 8260.

The solvent shed sample S-2 contained 34.9 mg/kg Tetrachlorethylene (TCE).

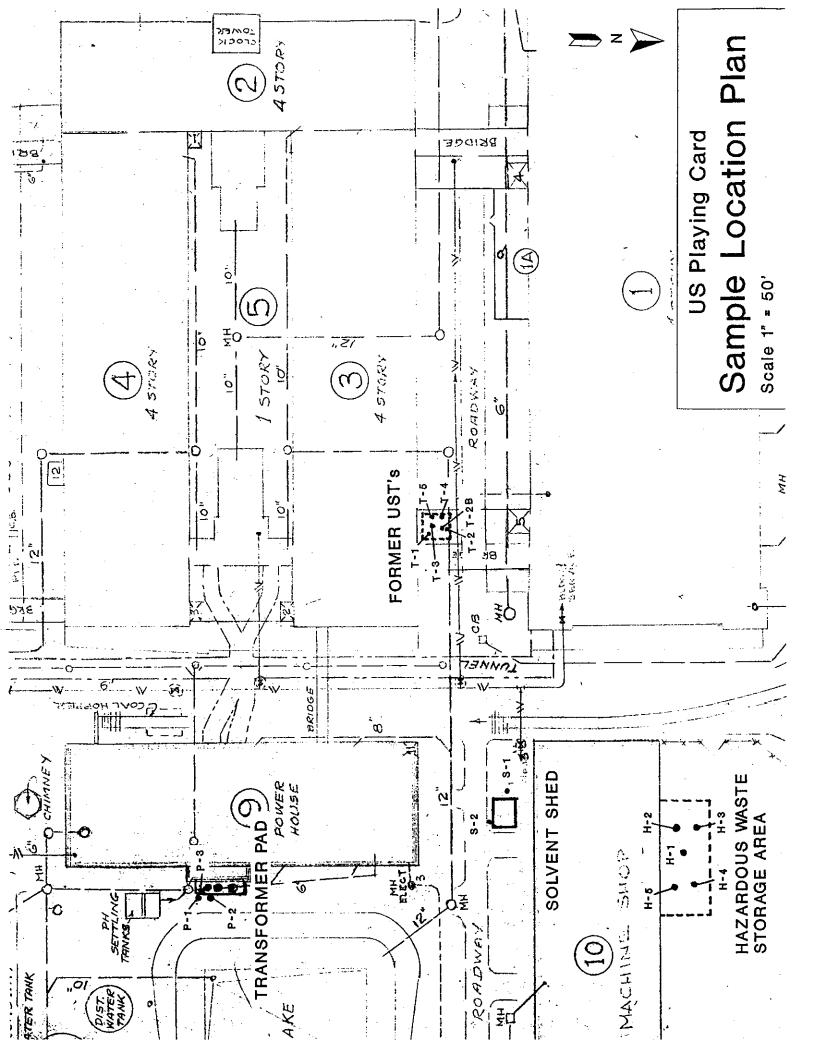
The transformer pad area samples P-1, P-2 and P-3 contained PCB Arochlor 1260 at 2090, 590 and 103,000 mg/kg respectively. See table T-2 for results.

TABLE T-2 SAMPLE RESULTS

Sample Number Compound Concentration						
T-1 T-5 S-2 H-1 H-2 H-3 H-4 H-5	VOC	BDL T-4 VOC BDL BDL 34.9 mg/kg BDL				
P-1 P-2 P-3	PCB (Arochlor 1260) PCB (Arochlor 1260) PCB (Arochlor 1260)	2,090 mg/kg 590 mg/kg 103,000 mg/kg				

VOC = Volatile Organic Compound
PCB = Polychlorinated Biphenyl
BDL = Below Detection Limit
mg/kg = milligram per kilogram

# APPENDIX A



05 H-1
06 H-2
07 H-3
08 H-4
09 H-5
10 P-1
11 P-2
12 P-3

Page 2

EEI

REPORT

Work Order # 94-10-096

Received: 10/06/94

Results By Test

TEST CODE		Sample <u>10</u>	Sample <u>11</u>	Sample <u>12</u>	
default units		(entered units)	(entered units)	(entered units)	
	-				
PCBS	1	2,090	590	103,000	
mg/kg	ı	mg/kg 1260	mg/kg 1260	mg/kg 1260	
	-				

Received: 10/06/94

Results by Sample

SAMPLE ID T-1 FRACTION 01A TEST CODE SVOA NAME Volatile Organics, solid Date & Time Collected 10/06/94 08:56:00 Category \_\_\_

PARAMETER		RESULT	LIMIT	
Benzene		BDL	0.00	)5 <u>0</u>
Bromodichloromethane		BDL	0.00	<u>)50</u>
Bromoform		BDL	0.00	050
Bromomethane		BDL	0.0	110
Carbon tetrachloride		BDL	0.00	<u>)50</u>
Chlorobenzene		BDL	0.00	)5 <u>0</u>
Chloroethane		BDL	0.00	<u>150</u>
Chloroform		BDL	0.00	<u>)50</u>
Chloromethane		BDL	0.0	10
Dibromochloromethane		BDL	0.00	<u>)50</u>
1,2-Dichlorobenzene		BDL	0.00	<u>)50</u>
1,3-Dichlorobenzene		BDL	0.00	<u> 150</u>
1,4-Dichlorobenzene		BDL	0.00	<u> 50</u>
1,1-Dichloroethane		BDL	0.00	<u>)50</u>
1,2-Dichloroethane		BDL	0.00	<u>)50</u>
1,1-Dichloroethene		BDL	0.00	<u> 150</u>
trans-1,2-Dichloroethene		BDL	0.00	<u>)50</u>
1,2-Dichloropropane		BDL	0.00	) <u>50</u>
cis-1,3-Dichloropropene		BDL	0.00	50
trans-1,3-Dichloropropene		BDL	0.00	<u>)50</u>
Ethyl benzene		BDL	0.00	<u> 50</u>
Methylene chloride		BDL	0.0	10
1,1,2,2-Tetrachloroethane		BDL	0.00	<u> 50</u>
Tetrachlorethene		BDL	0.00	50
Toluene		BDL	0.00	<u>150</u>
1,1,1-Trichloroethane		BDL	0.00	<u>)50</u>
1,1,2-Trichloroethane		BDL	0.00	<u>150</u>
Trichloroethene		BDL	0.00	<u>150</u>
Trichlorofluoromethane		BDL	0.00	<u>150</u>
Vinyl chloride	-	BDL	0.00	<u>150</u>
Xylenes		BDL	0.0	15
SURROGATE	%RECOV	ERY	LIMITS	3
Dibromofluoromethane	9	<u>5</u> .	80 -	120
Toluene-d8	9	<u>8</u> .	81 -	117
4-Bromofluorobenzene	10	<u>o</u> .	74 -	121

Notes and Definitions for this Report:

DATE RUN <u>10/12/94</u> ANALYST REH CONC FACTOR \_\_\_\_1 UNITS <u>mq/kq</u>
METHOD <u>8260</u> REPORT

Work Order # 94-10-096

## Results by Sample

Received: 10/06/94

SAMPLE ID T-4 FRACTION 02A TEST CODE SVOA NAME Volatile Organics, solid

Date & Time Collected 10/06/94 10:45:00 Category \_\_\_\_

PARAMETER	RESU	LT	LIMIT	
Benzene		BDL	0.0050	
Bromodichloromethane		BDL	0.0050	
Bromoform		BDL	0.0050	
Bromomethane		BDL	0.010	
Carbon tetrachloride		BDL	0.0050	
Chlorobenzene		BDL	0.0050	
Chloroethane		BDL	0.0050	
Chloroform		BDL	0.0050	
Chloromethane		BDL	0.010	
Dibromochloromethane		BDL	0.0050	
1,2-Dichlorobenzene		BDL	0.0050	
1,3-Dichlorobenzene		BDL	0.0050	
1,4-Dichlorobenzene		BDL	0.0050	
1,1-Dichloroethane		BDL	0.0050	
1,2-Dichloroethane		BDL	0.0050	
1,1-Dichloroethene		BDL	0.0050	
trans-1,2-Dichloroethene		BDL	0.0050	
1,2-Dichloropropane		BDL	0.0050	
cis-1,3-Dichloropropene		BDL	0.0050	
trans-1,3-Dichloropropene		BDL	0.0050	
Ethyl benzene		BDL	0.0050	
Methylene chloride		BDL	0.010	
1,1,2,2-Tetrachloroethane		BDL	0.0050	
Tetrachlorethene		BDL	0.0050	
Toluene		BDL	0.0050	
1,1,1-Trichloroethane		BDL	0.0050	
1,1,2-Trichloroethane		BDL	0.0050	
Trichloroethene		BDL	0.0050	
Trichlorofluoromethane		BDL	0.0050	
Vinyl chloride		BDL	0.0050	
Xylenes		BDL	0.015	
SURROGATE	%RECOVERY		LIMITS	
Dibromofluoromethane	91	_	80 -	120
Toluene-d8	102	_	<u>81</u>	117
4-Bromofluorobenzene	101	_	<u>74</u>	121

Notes and Definitions for this Report:

DATE RUN <u>10/12/94</u>

ANALYST REH

 CONC FACTOR
 1

 UNITS
 mq/kq

 METHOD
 8260

## Results by Sample

Received: 10/06/94

SAMPLE ID T-5 FRACTION 03A TEST CODE SVOA NAME Volatile Organics, solid Date & Time Collected 10/06/94 10:57:00 Category \_\_\_\_\_

PARAMETER	F	RESULT	LIMIT	
Benzene	_	BDL	0.0050	
Bromodichloromethane	_	BDL	0.0050	
Bromoform	_	BDL	0.0050	
Bromomethane	_	BDL	0.010	
Carbon tetrachloride	_	BDL	0.0050	
Chlorobenzene	_	BDL	0.0050	
Chloroethane	_	BDL	0.0050	
Chloroform	_	BDL	0.0050	
Chloromethane	_	BDL	0,010	
Dibromochloromethane		BDL	0.0050	
1,2-Dichlorobenzene	_	BDL	0.0050	
1,3-Dichlorobenzene	_	BDL	0.0050	
1,4-Dichlorobenzene	_	BDL	0.0050	
1,1-Dichloroethane	_	BDL	0.0050	
1,2-Dichloroethane	_	BDL	0.0050	
1,1-Dichloroethene	_	BDL	0.0050	
trans-1,2-Dichloroethene	_	BDL	0.0050	
1,2-Dichloropropane	_	BDL	0.0050	
cis-1,3-Dichloropropene	_	BDL	0.0050	
trans-1,3-Dichloropropene	_	BDL	0.0050	
Ethyl benzene	_	BDL	0.0050	
Methylene chloride		BDL	0.010	
1,1,2,2-Tetrachloroethane	_	BDL	0.0050	
Tetrachlorethene	_	BDL	0.0050	
Toluene	_	BDL	0.0050	
1,1,1-Trichloroethane	_	BDL	0,0050	
1,1,2-Trichloroethane	_	BDL	0.0050	
Trichloroethene	_	BDL	0.0050	
Trichlorofluoromethane	_	BDL	0.0050	
Vinyl chloride	_	BDL	0.0050	
Xylenes	-	BDL	0.015	
SURROGATE	%RECOVE	ERY	LIMITS	
Dibromofluoromethane	96	<u> </u>	80 -	120
Toluene-d8	100	- <u>-</u>	81 -	117
4-Bromofluorobenzene	97	-	74 -	121

Notes and Definitions for this Report:

DATE RUN <u>10/12/94</u> ANALYST REH 
 CONC FACTOR
 1

 UNITS
 mg/kg

 METHOD
 8260
 BEI

REPORT

Work Order # 94-10-096

Results by Sample

SAMPLE ID <u>S-2</u>

Received: 10/06/94

FRACTION <u>04A</u> TEST CODE <u>SVOA</u> NAME <u>Volatile Organics</u>, <u>solid</u>

Date & Time Collected <u>10/06/94</u> <u>11:30:00</u> Category \_\_\_\_\_

PARAMETER	RESULT	LIMIT
Benzene	BD	<u> </u>
Bromodichloromethane	BD	<u>L</u> 30
Bromoform	BD	<u>L</u> 30
Bromomethane	BDI	<u> 60</u>
Carbon tetrachloride	BDI	<u> 30</u>
Chlorobenzene	BDI	<u>30</u>
Chloroethane	BDI	<u>. 30</u>
Chloroform	BDI	<u>30</u>
Chloromethane	BD	<u>60</u>
Dibromochloromethane	BDI	<u>30</u>
1,2-Dichlorobenzene	BD1	30
1,3-Dichlorobenzene	BDI	<u>30</u>
1,4-Dichlorobenzene	BD1	<u>30</u>
1,1-Dichloroethane	BD1	30
1,2-Dichloroethane	BD	<u>30</u>
1,1-Dichloroethene	BDI	<u>30</u>
trans-1,2-Dichloroethene	BD1	<u>30</u>
1,2-Dichloropropane	BDI	<u>30</u>
cis-1,3-Dichloropropene	BD1	30
trans-1,3-Dichloropropene	BDI	<u>30</u>
Ethyl benzene	BD1	<u>30</u>
Methylene chloride	BD1	<u> 60</u>
1,1,2,2-Tetrachloroethane	BD	<u>30</u>
Tetrachlorethene	34.	30
Toluene	BDI	<u>30</u>
1,1,1-Trichloroethane	BDI	<u>30</u>
1,1,2-Trichloroethane	BDI	<u>30</u>
Trichloroethene	BDI	30
Trichlorofluoromethane	BDI	30
Vinyl chloride	BDI	30
Xylenes	BDI	90
SURROGATE	%RECOVERY	LIMITS
Dibromofluoromethane	94	<u>80</u> - <u>120</u>
Toluene-d8	102	<u>81</u> - <u>117</u>
4-Bromofluorobenzene	107	<u>74</u> - <u>121</u>

Notes and Definitions for this Report:

DATE RUN  $\frac{10/12/94}{2000}$ ANALYST REH
CONC FACTOR  $\frac{6,000}{200}$ UNITS  $\frac{mq/kq}{200}$ METHOD  $\frac{8260}{200}$ 

Results by Sample

SZ

Received: 10/06/94

AMPLE ID <u>H-1</u>	FRACTION <u>05A</u>	TEST CODE SVOA	NAME Vola	tile Organics, solid	_
	Date & Time Co	llected 10/06/94 12	:33:00	Category	_

PARAMETER	RESULT	LIMIT	
Benzene	BDL	0.0050	
Bromodichloromethane	BDL	0.0050	
Bromoform	BDL		
Bromomethane	BDL	0.010	
Carbon tetrachloride	BDL	0.0050	
Chlorobenzene	BDL	0.0050	
Chloroethane	BDL	0.0050	
Chloroform	BDL	0.0050	
Chloromethane	BDL	0.010	
Dibromochloromethane	BDL	0.0050	
1,2-Dichlorobenzene	BDL	0.0050	
1,3-Dichlorobenzene	BDL	0.0050	
1,4-Dichlorobenzene	BDL	0.0050	
1,1-Dichloroethane	BDL	0.0050	
1,2-Dichloroethane	BDL	0.0050	
1,1-Dichloroethene	BDL	0.0050	
trans-1,2-Dichloroethene	BDL	0.0050	
1,2-Dichloropropane	BDL	0.0050	
cis-1,3-Dichloropropene	BDL	0.0050	
trans-1,3-Dichloropropene	BDL	0.0050	
Ethyl benzene	BDL	0.0050	
Methylene chloride	BDL	0.010	
1,1,2,2-Tetrachloroethane	BDL	0.0050	
Tetrachlorethene	BDL	0.0050	
Toluene	BDL	0.0050	
1,1,1-Trichloroethane	BDL	0.0050	
1,1,2-Trichloroethane	BDL	0.0050	
Trichloroethene	BDL	0.0050	
Trichlorofluoromethane	BDL	0.0050	
Vinyl chloride	BDL	0.0050	
Xylenes	BDL	0.015	
SURROGATE	krecovery	LIMITS	
Dibromofluoromethane	96	80 -	120
Toluene-d8	99	81 -	117
4-Bromofluorobenzene	94	74 -	121

Notes and Definitions for this Report:

DATE RUN <u>10/12/94</u> ANALYST REH 
 CONC FACTOR
 1

 UNITS
 mq/kq

 METHOD
 8260
 Received: 10/06/94

REPORT

Work Order # 94-10-096

## Results by Sample

SAMPLE ID <u>H-2</u>

FRACTION <u>06A</u> TEST CODE <u>SVOA</u> NAME <u>Volatile Organics</u>, solid

Date & Time Collected 10/06/94 12:35:00

Category \_\_\_\_

PARAMETER	RESULT	LIMIT
Benzene	BDL	0.0050
Bromodichloromethane	BDL	0.0050
Bromoform	BDL	0.0050
Bromomethane	BDL	0.010
Carbon tetrachloride	BDL	0.0050
Chlorobenzene	BDL	0.0050
Chloroethane	BDL	0.0050
Chloroform	BDL	0.0050
Chloromethane	BDL	0.010
Dibromochloromethane	BDL	0.0050
1,2-Dichlorobenzene	BDL	0.0050
1,3-Dichlorobenzene	BDL	0.0050
1,4-Dichlorobenzene	BDL	0.0050
1,1-Dichloroethane	BDL	0.0050
1,2-Dichloroethane	BDL	0.0050
1,1-Dichloroethene	BDL	0.0050
trans-1,2-Dichloroethene	BDL	0.0050
1,2-Dichloropropane	BDL	0.0050
cis-1,3-Dichloropropene	BDL	0.0050
trans-1,3-Dichloropropene	BDL	0.0050
Ethyl benzene	BDL	0.0050
Methylene chloride	BDL	0.010
1,1,2,2-Tetrachloroethane	BDL	0.0050
Tetrachlorethene	BDL	0.0050
Toluene	BDL	0.0050
1,1,1-Trichloroethane	BDL	0.0050
1,1,2-Trichloroethane	BDL	0.0050
Trichloroethene	BDL	0.0050
Trichlorofluoromethane	BDL	0.0050
Vinyl chloride	BDL	0.0050
Xylenes	BDL	0.015
SURROGATE	%RECOVERY	LIMITS
Dibromofluoromethane	108	80 - 120
Toluene-d8	102	81 - 117
4-Bromofluorobenzene	111_	<u>74</u> - <u>121</u>

Notes and Definitions for this Report:

DATE RUN 10/12/94

ANALYST REH

 $\begin{array}{c|c} \text{CONC FACTOR} & \underline{1} \\ \text{UNITS} & \underline{\text{mg/kq}} \\ \text{METHOD} & \underline{8260} \\ \end{array}$ 

Received: 10/06/94

Results by Sample

SAMPLE ID H-3 FRACTION 07A TEST CODE SVOA NAME Volatile Organics, solid

Date & Time Collected 10/06/94 12:42:00 Category

PARAMETER	1	RESULT	LIMIT	
Benzene		BDL	0.0050	
Bromodichloromethane		BDL	0.0050	
Bromoform	_	BDL	0.0050	
Bromomethane		BDL	0.010	
Carbon tetrachloride	-	BDL	0.0050	
Chlorobenzene		BDL	0.0050	
Chloroethane	_	BDL	0.0050	
Chloroform		BDL	0.0050	
Chloromethane	-	BDL	0.010	
Dibromochloromethane	_	BDL	0.0050	
1,2-Dichlorobenzene	_	BDL	0.0050	
1,3-Dichlorobenzene	_	BDL	0.0050	
1,4-Dichlorobenzene		BDL	0.0050	
1,1-Dichloroethane	_	BDL	0.0050	
1,2-Dichloroethane	-	BDL	0,0050	
1,1-Dichloroethene	-	BDL	0.0050	
trans-1,2-Dichloroethene	-	BDL	0,0050	
1,2-Dichloropropane	_	BDL	0.0050	
cis-1,3-Dichloropropene		BDL	0.0050	
${\tt trans-1,3-Dichloropropene}$	-	BDL	0.0050	
Ethyl benzene	_	BDL	0.0050	
Methylene chloride		BDL	0.010	
${\tt 1,1,2,2-Tetrachloroethane}$	-	BDL	0.0050	
Tetrachlorethene	-	BDL	0.0050	
Toluene	_	BDL	0.0050	
1,1,1-Trichloroethane	-	BDL	0.0050	
1,1,2-Trichloroethane	-	BDL	0.0050	
Trichloroethene	-	BDL	0.0050	
Trichlorofluoromethane	-	BDL	0.0050	
Vinyl chloride	-	BDL	0.0050	
Xylenes	-	BDL	0,015	
SURROGATE	%RECOVI	ERY	LIMITS	
Dibromofluoromethane	91	<u> </u>	80 -	120
Toluene-d8	103	<u>3</u> .	81 -	117
4-Bromofluorobenzene	9:	<u>3</u> .	74 -	121

Notes and Definitions for this Report:

DATE RUN  $\frac{10/12/94}{4}$ ANALYST  $\frac{REH}{2}$ CONC FACTOR  $\frac{1}{2}$ UNITS  $\frac{mq/kq}{2}$ METHOD  $\frac{8260}{2}$ 

Page 10

Received: 10/06/94

## Results by Sample

REPORT

REI

SAMPLE ID H-4 FRACTION 08A TEST CODE SVOA NAME Volatile Organics, solid

Date & Time Collected 10/06/94 12:49:00 Category

PARAMETER		RESULT	LIMIT	
Benzene		BDL	0.005	<u>o</u>
Bromodichloromethane		BDL	0.005	<u>0</u>
Bromoform		BDL	0.005	<u>0</u>
Bromomethane		BDL	0.01	<u>o</u>
Carbon tetrachloride		BDL	0.005	<u>o</u>
Chlorobenzene		BDL	0.005	<u>o</u>
Chloroethane		BDL	0.005	0
Chloroform		BDL	0.005	<u>o</u>
Chloromethane		BDL	0.01	<u>o</u>
Dibromochloromethane		BDL	0.005	<u>o</u>
1,2-Dichlorobenzene		BDL	0.005	<u>o</u>
1,3-Dichlorobenzene		BDL	0.005	<u>o</u>
1,4-Dichlorobenzene		BDL	0.005	<u>0</u>
1,1-Dichloroethane		BDL	0.005	<u>o</u>
1,2-Dichloroethane		BDL	0.005	<u>0</u>
1,1-Dichloroethene		BDL	0.005	<u>0</u>
trans-1,2-Dichloroethene		BDL	0.005	<u>o</u>
1,2-Dichloropropane		BDL	0.005	<u>o</u>
cis-1,3-Dichloropropene		BDL	0.005	<u>0</u>
trans-1,3-Dichloropropene		BDL	0.005	<u>o</u>
Ethyl benzene		BDL	0.005	<u>o</u>
Methylene chloride		BDL	0.01	<u>o</u>
1,1,2,2-Tetrachloroethane		BDL	0.005	<u>o</u>
Tetrachlorethene		BDL	0.005	<u>o</u>
Toluene		BDL	0.005	<u>o</u>
1,1,1-Trichloroethane		BDL	0.005	<u>0</u>
1,1,2-Trichloroethane		BDL	0.005	<u>o</u>
Trichloroethene		BDL	0.005	<u>o</u>
Trichlorofluoromethane		BDL	0.005	<u>0</u>
Vinyl chloride		BDL	0.005	<u>o</u>
Xylenes		BDL	0.01	<u>5</u>
SURROGATE	%RECO\	ERY	LIMITS	
Dibromofluoromethane	9	<u> </u>	80 -	120
Toluene-d8	10	<u>)2</u>	81 -	117
4-Bromofluorobenzene		<u> </u>	74 -	121

Notes and Definitions for this Report:

 $\begin{array}{cccc} \text{DATE} & \text{RUN} & \underline{10/12/94} \\ \text{ANALYST} & \underline{\text{REH}} \\ \text{CONC} & \text{FACTOR} & \underline{1} \\ \text{UNITS} & \underline{\text{mg/kg}} \\ \text{METHOD} & \underline{8260} \\ \end{array}$ 

RET

REPORT

Work Order # 94-10-096

Results by Sample

Received: 10/06/94

- -

SAMPLE ID H-5 FRACTION 09A TEST CODE SVOA NAME Volatile Organics, solid

Date & Time Collected 10/06/94 12:59:00 Category

PARAMETER	RESUI	т	LIMIT	
Benzene		BDL	0.0050	
Bromodichloromethane		BDL	0.0050	
Bromoform		BDL	0.0050	
Bromomethane		BDL	0.010	
Carbon tetrachloride		BDL	0.0050	
Chlorobenzene		BDL	0.0050	
Chloroethane		BDL	0.0050	
Chloroform		BDL	0.0050	
Chloromethane		BDL	0.010	
Dibromochloromethane	-			
		BDL	0.0050	
1,2-Dichlorobenzene		BDL	0.0050	
1,3-Dichlorobenzene		BDL	0.0050	
1,4-Dichlorobenzene		BDL	0.0050	
1,1-Dichloroethane		BDL	0.0050	
1,2-Dichloroethane	-	BDL	0.0050	
1,1-Dichloroethene		BDL	0.0050	
trans-1,2-Dichloroethene		BDL	0.0050	
1,2-Dichloropropane		BDL	0.0050	
cis-1,3-Dichloropropene		BDL	0.0050	
trans-1,3-Dichloropropene		BDL	0.0050	
Ethyl benzene		BDL		
Methylene chloride		BDL	0.010	
1,1,2,2-Tetrachloroethane		BDL	0.0050	
Tetrachlorethene	<del>.</del>	BDL	0.0050	
Toluene		BDL	0.0050	
1,1,1-Trichloroethane		BDL	0.0050	
1,1,2-Trichloroethane		BDL	0.0050	
Trichloroethene		BDL	0.0050	
Trichlorofluoromethane		BDL	0.0050	
Vinyl chloride		BDL	0.0050	
Xylenes		BDL	0.015	
SURROGATE	%RECOVERY		LIMITS	
Dibromofluoromethane	98		80 -	120
Toluene-d8	102			117
4-Bromofluorobenzene	98	_	74 -	121

Notes and Definitions for this Report:

 DATE RUN
 10/12/94

 ANALYST
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 1

 UNITS
 mg/kg

 METHOD
 8260

**USPC Asbestos Summary** 

Area ACM Located	Material Containing ACM	Rating	Occupied Space	Estimated Cost of Abatement	Adjusted Cost	
		7145/112	- Goodbise object	MONRIESCO GODI GI POSICIII	Adjusted Coat	
Building #1	Aircell-Pipe insulation throughout the building		Yee	\$26,325	\$325.00	20 Chair Feet claim
Building #4	Cemetitious Fittings on fiberglass lines throughtout the building		Yas	\$1,742		- Sedential
Building #1	Exyered-paper pipe insulation throughout the building		Yee	included in Aircell above		
Building #1	Preformed-block pipe insulation througout the building		Yes	included in Aircell above		
Building #1	Window saulising throughout the building		Yes	815,090		
Building #1	Roofing		No	\$129,800		
<del></del>			Total	\$172,767		
Buliding #2	Layered-paper pipe insulation throughout the building	<del></del>	Yes	included in Aircell below		
Building #2	Aircell-Pipe insulation throughout the building		Yes	\$10,315	\$1,950	180 Jane Test Tes
Building #2	Window osuliding throughout the building		Yes	\$65,424	*.,	
Building #2	Ploor tile under carpet throughout the building		Yes	\$84,604	,	_
Building #2	Redistor heat shield throughout the building		Yes	\$510		
Building #2	Roofing		No No	\$32,400		
			Total	\$199,313		
	And the same and the same at t		ļ			
Building #3	12in. X 12in. Floor tile throughout building		Yes	92,150		
Building #3	Preformed-block pipe insulation througout the building		Yes	\$19,008	\$520	
Building #3 Building #3	Layered-paper pipe insulation throughout the building		Yes	included in preformed block above		
Building #8	Window saulking throughout the building Roofing	$\overline{}$	Yes	\$18,576 \$48,600	<del></del>	
BRIGHT WE	ROOMING	<del></del>	Total	\$48,332	ļ	
			1041	\$60,042		
Building #4	Preformed-block pipe insulation througout the building		Yes	Included in Aircell below	<del> </del>	
Building #4	Aircell-Pipe Insulation throughout the building		Yes	\$31,666	\$130	10 Linear Peet Dams
Building #4	9in. X 9in. And 12in. X 12in. Floor tile throughout the building	<del>"                                     </del>	Yes	\$2,008	\$500	250 Square Feet Day
Building #4	Window sauliding throughout the building		Yes	\$18,144		
Building #4	Rooting		No	\$48,800		-
			Total	\$100,405		
Buliding #6	Alroell-Pipe Insulation throughout the building		Yes	12,925		
Building #6	Layered-paper pipe insulation throughout the building		Yee	Included in Aircell above		
Building #6_	Roofing		No	\$48,600		
		$\longrightarrow$	Total	\$61,526	ļ	
B. Main a die			<u> </u>		<u> </u>	
Building #6 Building #6	Prefermed-block pipe insulation throughut the building	<del></del>	Yes	<b>89,815</b>		
Building #6	Window Cauliding   Resilient Floor Covering		Yee	\$1,248		
Building #6	Resilient Floor Covering Roofing		Yes No	\$31,200 \$0.00		
Dullully #0	rooming		Total	\$42,263		
			1001	\$32,200	<del> </del>	
			<del> </del>	<del>                                     </del>		<del></del>
Building #6A	Sin. X Sin. Floor tile throughout the building		Yes	\$13,870		
Quilding ##A	Lincieum throughout the building		Yes	Included above		
Building #6A	Preformed-block pipe insulation througout the building		Yes	Included in Aircell below		
Building #6A	Terred tape pipe wrap insulation throughout the building		Yes	\$260		
Building #6A	Preformed-block pipe insulation througout the building		Yes	Included in Aircell below		
Building #6A	Aircell-Pipe Insulation throughout the building		Yes	917,366	\$1,430	110 Linear feet dame
Building #6A	Lining of radiator covers throughout the building		Yes	\$600		
Building #6A	Raofing		No	\$21,800		
			Total	\$83,685		
Bulldian 47				ļ		
Building #7 Building #7	Sin. X Sin. And 12in. X 12in. Floor tile throughout the building		No (warehouse )	\$24,128	\$6,670	بد سستوردات ا
Building #7	Lineleum throughout the building Preformed-block pipe insulation througout the building		No (warehouse)	Induded Above		_+
Building #7	Aircef-Pipe Insulation throughout the building		No (warehouse)	Included in Aircell below \$59,280	D. 105	
Building #7	Window souling throughout the building	<del></del>	No (warehouse)	\$16,950	\$1,495	
Bullding #7	Levered-paper pipe insulation throughout the building	<del></del>	No (warehouse)	Included in Aircelf above	<del> </del>	
manania es	Cayarac papar pro-macastron and pullering		( ASI	INGRESS IN ARREST EDOVE	l	

USPC Asbestos Summary

Reminded Minas III (E bound Minas St.O.) bour / Combined ocurse )	2000	93.000			Charles Thomas Ashara	Training
	\$1,690	91,890	Yee	tton	Layered pipe Insulation	Overhead Welkway
		\$48,086	₹		Thermal Insulation	Tunnels
		\$19,328	Total			
		\$18,000	₹6		Roofing	Building #10
		\$710	. No	on throughout the building	Airoel-Pipe inexist	Building #10
	-	9646	₹	Window glasing throughout the building	Window glasing thr	Building and
		9611	Total			
		0	76		Moofing	DUNGING WIO
		\$611	₹	Arcel Fipe insulation throughout the building	Arrost-Pipe Insued	Building #10
		\$1,701	TOBI			
		\$1,125	₹		Roofing	eta Bubling
		\$676	8	vencow causing avolutions are duraing	A Duesnies AssultA	Delia Bulletina
						Building data
		\$42,963	Total			
		837,600	₹		Roofing	Building P10
		\$4,498	Yes	Window cautions throughout the building	Window cautions th	Bullidag #10
		\$976	Yes	Aircal-Pipe insulation throughout the building	Airost-Pipe insulati	Building #10
		8778 744	Total			
		200	No Down House	Rooms	Roofing	Building and
		4444	No - Baucar Harina	resident of the hidden	Whydru on thing th	
		070,000	No - Power House	THE PERSON NAMED IN COLUMN TWO IS NOT THE PERSON NAMED IN COLUMN TWO IS NAMED IN COLUMN TWI	Boiler door graduat	est pulpling
		\$40.800	No - Power House	Preformed-block insulation on boiler breesting inside and outside of building	Preformed-block in	Buliding #8
		\$12,000	No - Power House	bollere	Peformed bricks on bollers	entering entering
		\$12,900	No - Power House		Cauliding on bollers	Building #8
		\$400	No - Power House	Transite panel behind electrical breakers	Transite panel behi	Building #8
		Included in Preformed Block Pipe Above	No - Power House	Layered paper pipe insulation throughout the building	Layered-paper pipe	Buliding #0
		\$29,702	No - Power House	Preformed-blook pipe insulation throughout the building	Preformed-block pla	Building ##
		\$140,000	No - Power House	nk inculation	Pre-formed block tank insulation	Building #9
2		\$64,400	Total			
		840,500	No - Abendoned Building		Roofing	Building #8
		\$4,800	No - Abandoned Building	Window causiding throughout the building	Window cautiding th	Building #8
		<b>89,100</b>	No - Abundoned Building	Arosi-Pipe insulation throughout the building	Airost-Pipe insuleti	Building #6
		\$192,423	Total			
		881,600	( eenoveiew ) ch		Roofing	Building #7
	,	Included in Air Cell Above	No (warehouse)	Arrest duct mediation throughout the building	AIT-CHI QUOI MAURIO	autiong #/
					Ale and decade and an ale	

TOTAL

\$1,348,335

\$17,710.00

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Caulk on Boiler (in square feet)	formed Brick on Boilers (in square feet)	sformed Block Insulation on Boiler Exhaust (in	nk Insulation (in square feet)	i on Electrical Lines (in linear feet)	insite Radiator Lining (in square feet)	r Tape Pipe Insulation (in linear feet)	siliant Floor Covering (square feet)	adiator Heat Shield (square feet)	ofing (square feet)	indow Caulking (square feet)	amentous Fittings on Fiberglass (per count)	SI (linear feét)	
	1290	800 1290	2720 800 1290	0621 008 0272 1766	008 0272 1769 08	20 800 1290 180 9371 2720 800 1290	\$6 9371 \$720 800 1290 \$2 20 20 =	80 9321 SYSO 800 1290 1903 SS SO	1200 42332	1500	1500   1500	124   12500   12500   12500   1250	130

## sgnibliu& UA

with significant damage. contractor or asbestos trained renovation contractor repair the damaged eaulking on windows significantly damaged condition. BHE recommends that a licensed asbestos abatement The condition of window caulking around the windows of most buildings ranged from good to

Tunnels

clean up the debris and repair the damaged pipe insulation in the tunnels. and from Buildings 7 to Building 9. BHE recommends that a licensed abatement contractor The inspector noted aircell pipe insulation debris in the tunnels from Building 1 to Building 9

Overhead Walkway

overhead walkway between Buildings 3 and 9. The inspector noted 69 linear feet of significantly damaged layered-paper pipe insulation on the

Building 1

behind the cooker machine. This insulation is in an area occupied by employees that operate the Approximately 25 linear feet of damaged pipe insulation was noted by the inspector in Room 2.

cooker machine. BHE recommends that a licensed asbestos abatement contractor repair or

remove this damaged pipe insulation.

Batherical - 4th 1/400 - 8 linear 27 coursel 11/2 - 1.00

The inspector noted approximately 150 linear feet of damaged layered-pipe insulation in

Bullding 2, Room 41 on the first floor and 30 linear feet in Room 8 on the fourth floor. BHE

recommends that a licensed asbestos abatement contractor repair or remove this damaged pipe

E gaibling 3

Suibling 2

Approximately 20 linear feet of damaged layered pipe insulation in Room 46 on the The inspector noted damaged layered-paper-pipe insulation in the following locations

NO 141/1000 Approximately 5 linear feet in Room 52 on the fourth floor Approximately 10 linear feet in Rooms 56/57 on the third floor

BHE recommends that a licensed asbestos abatement contractor repair or remove this damaged pipe insulation.

4 gnibling

BOCKED SOLDBIHZ

tile. The inspector noted approximately 10 linear feet of damaged preformed-block pipe BHE recommends that a licensed asbestos abatement contractor remove the damaged floor The inspector noted approximately 250 square feet of damaged floor tile in Room 11 on the first

-> wor somices contractor repair the damaged piping. insulation in Room 7 on the second floor. BHE recommends that a licensed asbestos abatement

Ad gnibling

The inspector noted damaged layered-paper pipe insulation in the following locations:

Approximately 20 linear feet of in Room 48 on the first floor

The inspector noted significantly damaged layered-paper pipe insulation in the following location;

Approximately 30 linear feet of layered pipe insulation in Room 4 on the third floor

The inspector noted significant damage on aircell pipe insulation in the following locations:

Approximately 30 linear feet of aircell-pipe insulation in Room 4 on the third floor Approximately 20 linear feet of aircell-pipe insulation in Room 46 of the first floor

BHE recommends that a licensed asbestos abatement contractor repair or remove the damaged

pipe insulation.

7 gaibling

The inspector noted significantly damaged floor tile in the following locations:

Approximately 70 square feet in Room 41 on the first floor. Approximately 1,125 square feet Room 1 in the basement

• Approximately 2000 aquare feet of floor tile in Room 20 on the third floor. The inspector Approximately 150 square feet of damaged tile in Room 76 on the first floor Not 2001.

The inspector noted damaged preformed-block pipe insulation in the following locations: BHE recommends that a licensed asbestos abatement contractor remove the damaged floor tile. noted that the floor tile was being run over daily by hand trucks.

BHE Environmental, Inc.

- Approximately 15 linear feet of damaged was found in Room 12
- rook sent-orbito & moon missing of 18 year 1900 to the sent of t
- The inspector noted damaged layered-paper pipe insulation in the following locations:
- Approximately 10 linear feet of damaged layered-pipe insulation in Room 26 on the second floor

BHE recommends that a licensed asbestos contractor repair or remove the damaged insulation.

## ×8 gaibliu&

The inspector noted damaged sircell-pipe insulation in Building 8 (abandoned and unoccupied building). Pipe insulation was seen on the dirt floor of the crawl space on the west end of the building. The damaged insulation was wet apparently from water that has leaked through the damaged roof. BHE understands that USPCC is considering demolishing this building. State regulations require that all regulated ACM be removed prior to the building being demolished. BHE recommends that a licensed asbestos abatement contractor remove RACM prior to building demolition.

## 🔀 6 gaibliu&

The inspector noted Building 9 (Powerhouse) with having the most damaged ACM material. Tanks with preformed-block insulation and insulated piping in the building are significantly damaged. Tank insulation was exposed without jacketing and insulation debris from some tanks was lying on the floor. Preformed-block insulation debris from boilers was also found in Building 9. Photographs depicting some of the damaged ACMs in Building 9 were taken and presented in Appendix C. The inspectors recommend this building receive top priority for corrective action. BHE recommends that a licensed asbestos abatement contractor cleanup, remove, or repair the damaged ACM in Building 9. All significantly damaged ACM should be removed (ie., non-repairable).

## × 81 & 21 egniblina

recommends that a licensed asbestos abatement contractor cleanup the pipe insulation debris. 18. The inspector noted that most insulation from the piping was on the ground. BHE Damaged and significantly damaged aircell-pipe insulation was identified in Buildings 15 and

## Asphalt-based Roofing Material, Floor Tile, and MasticX

released into the air. Nonfriable asbestos-containing roofing and floor tile are classified as because the asbestos fibers are tightly bound in an asphalt or vinyl matrix and are not readily Standards for Hazardous Air Pollutants (NESHAP) regulations of November 20, 1990. This is considered regulated asbestos-containing material (RACM) per revised EPA National Emission asphalt-based roofing and resilient floor coverings such as floor tile, in good condition, are not considered nonfriable when in good condition and not damaged. Currently, asbestos-containing Asphalt-based roofing materials and resilient floor coverings, such as floor tile and linoleum, are

floor tile and or roofing becoming RACM subject to the NESHAP regulations. (such as sanding, cutting, or grinding) could render the ACM friable and, therefore, result in the demolition. However, any renovation activities that would subject the ACM to abrasive forces The State of Ohio does not require that these materials be removed from buildings prior to

involving the removal of Category I nonfriable materials. specific training requirements and work practices for construction or maintenance work the OSHA asbestos standard for the construction industry (29 CFR 1926.1101) which has non-friable and in good condition), contractors working with these materials must comply with contractor is not required for the removal of Category I nonfriable materials (provided they are construction or interior demolition work begins. Although a licensed asbestos abatement specially trained and equipped workers (usually a licensed asbestos abatement contractor) before materials will be affected by subsequent renovation, they should be removed properly by tile and mastic should be considered carefully to ensure that they are not disturbed. If these When planning renovation activities, asbestos-containing rooting materials, linoleum, and floor

of ACM and an average of current unit-price quotations from local asbestos abatement The estimated asbestos removal costs presented in Table 3 are based on the estimated quantities

Marie Ma

contractors. The estimate is provided as an indication of typical costs for asbestos abatement and is intended for use as a planning tool. Actual bid prices from contractor for asbestos removal can be extremely variable.

Qualified independent third party industrial hygienists and project monitors are recommended to oversee contractor performance and to ensure that the asbestos is removed in a safe and compliant manner and disposed properly in accordance with the project specifications and applicable federal, state, and local asbestos regulations. A rough "ball park" estimate for third party oversight and air monitoring is also presented; however, actual costs for third party oversight will depend on the project schedule and scope, length and number of work shifts, and the duration of the abatement project.

Employee Training Including Operations and Maintenance Work.

Currently, the OSHA asbestos standard for the construction industry (29 CFR 1926.1101) defines four classes of work involving ACM and has specific training requirements for each class.

Removal of asbestos-containing thermal system insulation or surfacing materials is considered "Class I asbestos work." OSHA requires that employees performing Class I operations receive the four-day EPA AHERA asbestos abatement worker training. Class I asbestos work should be conducted by a licensed asbestos abatement contractor.

Removal of asbestos-containing wallboard, resilient floor coverings, roofing and siding shingles, and construction mastics is considered "Class II asbestos work." OSHA requires that employees performing Class II operations also receive the four-day EPA AHERA asbestos abatement worker training.

Repair and maintenance operations, where thermal system insulation and surfacing material is likely to be disturbed, are considered "Class III asbestos work." OSHA requires that employees performing Class III operations receive the EPA 16-hour Operations and Maintenance (O&M) training course, including hands on training on respirators and work practices.

Maintenance and custodial activities during which employees contact ACM (but do not disturb it) and activities to clean up waste and debris containing ACM are considered "Class IV asbestos work." OSHA requires that employees performing Class IV operations receive the EPA two-

L

hour awareness training. This course should include instruction on the locations of ACM and on the recognition of damage, deterioration, or delamination of ACM. Class IV work must be overseen by a competent person who has received at least the two-day O&M training course.

BHE recommends that any workers performing Class II, III, or IV operations receive the appropriate training to reduce the risk of worker or occupant exposure to asbestos fibers during routine or emergency maintenance operations.

do

December 6, 2002

B

Mr. Mark Blaha Safety Director U.S. Playing Card Company 4590 Beech Street Cincinnati, Ohio 45212-3497

**Re:** Pre-demolition Asbestos Sampling of the Jet Dry Machine PN 1407.002

Dear Mr. Blaha:

On October 23, 2002, pursuant to your request, BHE Environmental, Inc. (BHE) conducted a pre-demolition asbestos survey of the jet dry machine located at the U.S. Playing Card Company in Cincinnati, Ohio.

Mr. David Gregory, an Ohio-certified Asbestos Hazard Evaluation Specialist (ODOH Cert. No. 32465), conducted the inspection. Mr. Rob Wilmot prepared this report. Mr. Mark Karaffa, CIH, Director of BHE's Industrial Hygiene and Safety Group, served as project manager and senior reviewer.

## SAMPLING AND ANALYTICAL METHODS

BHE collected seven samples of suspect asbestos-containing material from the jet dry machine that included:

- Gasket material on the access doors (upper and lower level)
- Preformed-block duct insulation (upper level)

Samples were submitted to Analytica Solutions, Inc. in Thornton, Colorado (Analytica) for analysis by polarized-light microscopy (PLM) in accordance with the prescribed Environmental Protection Agency (EPA) analytical protocol (40 CFR Part 763, Appendix A to Subpart F). Analytica is an AIHA- and NIST-accredited asbestos laboratory.

This analytical method, which the EPA currently accepts for the determination of asbestos in bulk samples of suspect asbestos-containing material (ACM), is used for the qualitative identification of six morphologically-different types of asbestos fibers: chrysotile, amosite, crocidolite, anthophyllite, tremolite, and actinolite asbestos. The method specifies that the asbestos content in a bulk sample shall be determined by visual estimation and reported as a finite percentage (rounded to the nearest percent) within the range of 0 to 100. Minute quantities of asbestos in bulk samples may be reported as "trace" (tr) or less than 1 percent. The analytical method determined the "area percent" asbestos or the percentage of the area of a microscopic field of view that is occupied by asbestos fibers.

The EPA and the Occupational Safety and Health Administration (OSHA) define ACM as any material that contains more than 1 percent asbestos.

## **KESOUTS AND DISCUSSION**

The gasket material sampled on the access doors on the lower level was negative for asbestos content, i.e., no asbestos fibers were detected.

Asbestos greater than I percent was found in samples of the following materials:

- Preformed-block duct insulation (upper level, approximately 560 square feet total)
- Rope gasket material on the access doors (upper level only, approximately 304 linear feet total)

Asbestos regulations require the removal of friable ACMs (including preformed block duct insulation and rope gaskets) prior to demolition of the jet dryer. BHE recommends that a licensed asbestos abatement contractor remove the doors with the gasket material intact prior to demolition. A licensed asbestos abatement contractor must submit 10-day notification to the Ohio EPA and Department of Health prior to removal of the ACM identified.

Please do not hesitate to call me at 513-326-1500 if you have any questions or comments, or would like additional technical assistance, abatement oversight, or air monitoring during removal of the ACM from the jet dryer.

Sincerely,

Rob Wilmot Industrial Hygienist

RHEDENAIRONMENTAL

CRW/mcb

Analytica Solutions, Inc.
12189 Pennsylvania Street
Thornton, Colorado 80241
(303) 469-8868
(800) 873-8707
Fax: (303) 469-5254



October 28, 2002

Mark Karaffa BHE Environmental, Inc. 11733 Chesterdale Road Cincinnati, OH 45246-3405

Re: LGN 343595 Project: 1407.002, US Playing Card-Jet Dry Machine

Dear Mark Karaffa:

The bulk samples recently submitted to our laboratory have been analyzed by polarized light microscopy (PLM), the EPA-recommended method for identification of throws constituents in building materials. The results of these analyses are summarized in the enclosed table. Also enclosed is a copy of documentation submitted with your samples.

It you have any technical questions concerning these analyses, please feel service Representatives.

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Analytica Solutions, Inc.
12189 Pennsylvania Street
Thornton, Colorado 80241
(303) 469-8868
(800) 873-8707

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## POLARIZED LIGHT MICROSCOPY (PLM) RESULTS OF BULK ASBESTOS SAMPLE ANALYSIS BY

Client: BHE Environmental, Inc.

#### 0.2 0.2 Cellulose 0.26 0.26 Fibrous Glass Ofher Fibrous Materials: 0.22 30.0 0.72 0 TOTAL ASBESTOS Tremolite-Actinolite Crocidolite Chrysotile Anthophyllite Amosite Asbestiform Minerals: Sample Number: 102302-A-1 102302-A-2 102302-A-4 102302-A-5 102302-A-6 Visual Area Estimation: Percentages Detected Results of PLM Analysis: PFB duct ins. [qrey, fibrous] 102302-A-6 10/23/2002 PFB duct ins. [qrey, fibrous] 102302-A-5 10/23/2002 PFB duct ins. [qrey, fibrous] 10/23/2002 102302-A-4 Gasket-lower level [tan/qrey woven fiberqlass] 10/23/2002 S-A-S0ES0I I-A-202201 Gasket-lower level [qrey woven fiberqlass] 10/23/2002 Describiton Sample Date Sample Number Sample Description: 7 l of Project ID: 1407.002, US Playing Card-Jet Dry Machine ₽age:



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Date:

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Percent Monfibrous

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₹525-69₽ (£0£) :xs¥ 7078-E78 (008) 8988-69% (£0£) Thornton, Colorado 80241 12189 Pennsylvania Street Analytica Solutions, Inc.



Client: BHE Environmental, Inc.

## POLARIZED LIGHT MICROSCOPY (PLM) RESULTS OF BULK ASBESTOS SAMPLE ANALYSIS BY

0.2 0.2 Material Percent Monfibrous огрек: Synthetics 0.0I 0.0I Cellulose Fibrous Glass Other Fibrous Materials: 0.28 0.28 TOTAL ASBESTOS Tremolite-Actinolite Crocidolite 0.28 0.28 Chrysotile Anthophyllite Amosite Asbestiform Minerals: Sample Mumber: 102302-A-7 8-A-S05S0I Visual Area Estimation: Percentages Detected Results of PLM Analysis: Gasket-upper level [tan, fibrous] 10/23/2002 102302-A-8 Gasket-upper level [tan, fibrous] 10/23/2002 102302-A-7 Describtion Sample Date Sample Number Sample Description: ₽age: 7 To S Project ID: 1407.002, US Playing Card-Jet Dry Machine TGM: 343282



10/28/2002

Date:



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343245

CHAIN: OE-CUSTODY RECORD

102302-4-4 102302-4-7 102302-4-6 102302-4-8 102302-4-5 102302-4 · BHE Sample 102302-A SILO NAMO: US PlAYING CANO-JET DRY MACKINE Cincinnat, Ohlo 46246 (613) 326-1600 FAX (613) 328-1650 BHE ENVIRONMENTAL, INC. 11735 Chesterfale Road Sample Volume ASBUSHI Analysis Requested Lab Destination: ANH 4 4 4 CA , W Preservative TURNAMOUND SOND ROPORTO: MARLE LAND CFA id e Collected 15 Playing SAMIE DAM MAK 70/01 ipenenedi 10 ابر اوا Date Collected Project Manager: Received By: Project Numbers Condition on Receipt: Relinquished Byr Date Relinquished: Lawer Lovel GASKET - UPPEN LEVEL Duct Ins. Special instructions: Sample Location ) 266

(rev. 10/30/01)

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## ANALYTICA SOLUTIONS

Thornton, Colorado 80241 12189 Pennsylvania Street

## BULK SAMPLE ANALYSIS PROCEDURES POLARIZED LIGHT MICROSCOPY (PLM)

required for certain samples. comparisons using a calibrated graticule. Additional tests and treatments (see below) may also be different Cargille<sup>a</sup> certified refractive index oils. Estimates of asbestos content are based on visual Bachelor's Degree in Geology using the July 1993, EPA Test Method, (EPA/600/R-93/116), "Method for the Determination of Asbestos in Bulk Building Materials"!). Samples are prepared and analyzed in Bulk samples of construction materials are analyzed by a professional mineralogist with a minimum of a

Unused portions of samples are archived for six months, then disposed of or returned to the client. two round robin QA/QC programs annually with accredited laboratories throughout the United States. submitted to be re-analyzed and logged into a quality control tracking system. Analytica participates in in-house QA/QC program is maintained on a daily basis that requires, at a minimum, 10% of samples participates in the NVLAP bulk asbestos proficiency testing program (results available upon request). An the National Voluntary Laboratory Accreditation Program (NVLAP) for bulk asbestos analysis. Analytica Analytica is accredited by the National Institute of Standards and Technology (Lab Code #101086) under

contains 10% asbestos, then the final report would show 5% asbestos in the original material. the ashed material, i.e. if 50% of the original material is lost due to ashing and the ashed sample present. The results shown on the final report are the percentage of asbestos in the original material, not percent tost due to ashing. The sample is then analyzed by PLM for the type and amount of asbestos undisturbed. The amount of ashed material is compared to the original amount to determine the volume 500° C for one hour or more. Most non-silicate interferants are eliminated, leaving only asbestos Ashing is a procedure in which one half of the sample is placed in a crucible and then set in a furnace at

## POINT COUNTING

bulk sample triability and cannot assume responsibility for client compliance with the MESHAP experienced analysts to perform point counts it needed. Analytica Solutions, Inc. cannot determine the point count procedures described in the EPA-600/R-93/116 test method. Analytica does have established rules requiring that friable ACM bulk samples with less than 10% asbestos be analyzed by As of November 20, 1990, the National Emission Standards for Hazardous Air Pollutants (NESHAP)

- does not contain asbestos, tests shall include analysis of 3 bulk samples of each homogeneous area of the (Z) On August 10, 1994, OSHA ruled that to demonstrate that Potential Asbestos Containing Material (PACM) positive (> 1%) ACM. Determination of ACM should be made strictly from the individual layers of each sample. reviewing an Analytica Solutions PLM analysis report, <u>do not</u> use the composite result for the determination of EPA issued a notice of advisory adopting a new AHERA policy consistent with the NESHAP policy. When clarification requires all layers of a sample must be analyzed and reported separately. On August 1, 1994, (1) In January 1994, a NESHAP clarification was issued regarding analysis of multi-layered samples. This
- PACM collected in a randomly distributed manner.
- This test report relates only to items tested.
- laboratory. (4) NVLAP policy requires that this report may not be reproduced except in full, without the written approval of the
- or any agency of the United States Government. (3) NVLAP policy requires that this report must not be used by the client to claim product endorsement by NVLAP

## SURVEY FOR ASBESTOS-CONTAINING MATERIALS

Prepared for:
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#### **EXECUTIVE SUMMARY**

BHE Environmental, Inc. (BHE) conducted a detailed survey for suspect asbestos-containing materials (ACM) in the United States Playing Card Company (USPCC) Facility located 4590 Beech Street, Cincinnati, Ohio.

This project is in support of USPCC efforts to develop an asbestos management plan for its facility in Cincinnati. The purpose of this survey was to identify the types, locations, quantities, and condition of asbestos-containing materials in the Beech Street facility.

The most pertinent findings of the inspection are listed below:

## Asbestos-containing Materials

#### Building 1

- Aircell-pipe insulation throughout the building
- Cemetitous fittings on fiberglass lines throughout the building
- Layered-paper pipe insulation throughout the building
- Preformed-block pipe insulation throughout the building
- Window caulking throughout the building

#### Building 2

- Layered-paper pipe insulation throughout the building
- Floor tile under carpet throughout the building
- Radiator heat shield throughout the building
- Aircell-pipe insulation throughout the building
- · Window caulking and glazing throughout the building

#### **Building 3**

- 12 in. x 12 in. floor tile throughout the building
- Preformed-block pipe insulation throughout the building
- Layered-paper pipe insulation throughout the building
- Window caulking throughout the building

#### Building 4

- Preformed-block pipe insulation throughout the building
- Aircell-pipe insulation throughout the building
- 9 in. x 9 in. and 12 in. x 12 in. floor tile throughout the building
- Window caulking throughout the building

## **Building 5**

- Aircell-pipe insulation throughout the building
- Layered-paper pipe insulation throughout the building

#### Building 6

Preformed-block pipe insulation throughout the building

#### Building 6A

- 9 in. x 9 in. floor tile and floor tile under carpet throughout the building
- Layered-paper pipe insulation throughout the building
- Tarred tape pipe wrap insulation throughout the building
- Preformed-block pipe insulation throughout the building
- Aircell-pipe insulation throughout the building
- Lining of radiator covers throughout the building

## **Building 7**

- 9 in. x 9 in and 12 in. x 12 in. floor tile throughout the building
- Linoleum throughout the building
- Preformed-block pipe insulation throughout the building
- Aircell-pipe insulation throughout the building
- Window caulking throughout the building
- Layered-paper pipe insulation throughout the building
- Tarred tape pipe wrap insulation throughout the building
- Aircell-duct insulation throughout the building

#### **Building 8**

- Aircell-pipe insulation throughout the building
- Window caulking throughout the building

## **Building 9**

- Preformed-block tank insulation
- Preformed-block pipe insulation throughout the building
- Layered-paper pipe insulation throughout the building
- Transite panel behind electric breakers
- Caulking on boilers
- Preformed brick on boilers
- Preformed-block insulation on boiler breeching inside and outside the building
- Boiler door gasket
- Window caulking throughout the building

#### **Building 10**

- Aircell-pipe insulation throughout the building
- Window caulking throughout the building

## **Building 13**

Window caulking throughout the building

### **Building 15**

• Aircell-pipe insulation throughout the building

#### **Building 18**

Window glazing throughout the building

A summary of the sampling locations and analytical results for suspect ACM is presented in Table 1. Copies of the analytical reports for the polarized-light microscopy (PLM) analyses are presented as Appendix A. Quantities of suspect and confirmed ACMs in each room or building area can be found on the individual Asbestos Field Forms compiled in Appendix B.

An inventory, by building, of the types and estimated quantities of ACM identified is presented in Table 2. Abatement cost estimates for removal are presented in Table 3.

#### 1.0 INTRODUCTION

BHE conducted a detailed asbestos-materials survey of the USPCC facility in Cincinnati, Ohio, between May and June 2002. The purpose of this survey was to identify the types, locations, quantities, and conditions of both friable and nonfriable ACMs in all designated USPCC buildings and structures. With this knowledge about ACMs throughout the facility, the USPCC can implement an effective asbestos management program in which sources of potential asbestos exposure are eliminated or controlled and appropriate asbestos controls and removal procedures are implemented prior to planned renovations, maintenance, or future demolition activities that could disturb the identified ACM..

This report presents descriptions of the inspection, sampling, and analytical methods used, the results of the ACM survey and material assessments, and managing the ACMs identified.

#### 1.1 BUILDING INSPECTION

The building survey was scheduled and coordinated through Mr. Arthur Thomas, USPCC Director of Industrial Engineering, and Mr. Trung Nguyen, Senior Project Manager. Mr. Dave Gregory and Mr. Rob Wilmot, both EPA-accredited Building Inspectors and Management Planners and Ohio-Certified Asbestos Hazard Abatement/Evaluation Specialists conducted the ACM surveys. Mr. Mark Karaffa, CIH, served as the BHE Project Manager

Upon arrival, the inspection team conducted a walk-through survey to identify suspect ACM, using building floor plans provided by USPCC of each building. This information helped to familiarize the inspectors with the facility and with the locations of various building components.

Because much of the USPCC facility is occupied, destructive inspection and sampling procedures to ascertain the possible presence of ACM behind intact walls and enclosed ceiling systems were not conducted. Also, to preserve the integrity of the existing roof system and to not void any existing warranties, BHE did not collect or analyze samples of suspect asphalt-based roofing materials. Asphalt-based roofing materials were assumed to be ACM.

#### 1.2 ASBESTOS INSPECTION

BHE conducted a detailed asbestos inspection of the USPCC facility. All accessible areas were visually checked and samples of suspect ACM were collected.

During the building inspection, BHE searched for suspect ACMs such as thermal system insulation on hot water/steam distribution lines, tanks, and boilers; suspended ceiling panels; acoustical ceiling tiles; and resilient floor coverings, etc., that could contain asbestos. Suspect materials were touched to determine their degree of friability and homogeneous sampling areas were identified. BHE used standard Asbestos Field Forms and building drawings to record pertinent information about the material and the building environment.

#### **Sampling Methods**

To avoid disturbing suspect ACM any more than necessary and to minimize the release of asbestos fibers, BHE performed bulk sampling of suspect materials in accordance with generally accepted procedures outlined in the current Environmental Protection Agency (EPA) guidance documents. Each sample was collected and placed in a clean, sealable plastic container and labeled with a unique sample identification number. This sample number was recorded on a Bulk Sample Log Sheet, the sample container, and at the sample location. Supplemental information was also recorded on the Bulk Sample Log Sheet including the date of the inspection, the name of the inspector, the building name, a brief description of the sample, the exact sampling location, and the type of material sampled (e.g., thermal insulation, ceiling tile, etc.).

BHE collected over 400 samples of suspect ACM. To help reduce the analytical costs, the lab was directed to stop analyzing samples from a homogeneous suspect material as soon as one positive analysis confirmed an asbestos content >1%.

#### 1.3 ANALYTICAL METHODS

#### Polarized-light Microscopy

The samples selected were submitted periodically throughout the survey to Analytica Solutions, Inc., Thornton, Colorado, for analysis by polarized-light microscopy (PLM) with dispersion

staining in accordance with the prescribed EPA analytical protocol (40 CFR Part 263, Appendix A to Subpart F).

This analytical method, which the EPA currently recommends for the determination of asbestos in bulk samples of friable insulation materials, is used for the qualitative identification of six morphologically different types of asbestos fibers: chrysotile, amosite, crocidolite, anthophyllite, tremolite, and actinolite asbestos.

The method specifies that the asbestos content in a bulk sample be determined by visual estimation and reported as a finite percentage (rounded to the nearest percent) within the range of 0 to 100. Minute quantities of asbestos in bulk samples may be reported as "trace" (tr) or less than 1%. The analytical method determines the "area percent" asbestos or the percentage of the area of a microscopic field of view that is occupied by asbestos fibers.

The EPA and the Occupational Safety and Health Administration (OSHA) define ACM as any material that contains more than 1% asbestos.

The Analytica Solutions laboratory is accredited for asbestos bulk analyses by the National Institute of Standards and Technology (NIST) under its National Voluntary Laboratory Accreditation Program (NVLAP) No. 101086. NVLAP is the quality assurance program for laboratories analyzing bulk samples for asbestos content by PLM.

A summary of the sampling locations and analytical results for suspect ACM is presented in Table 1. Bulk sample locations are presented in Figure 1 on individual building maps as a separate attachment. Copies of the analytical reports for the PLM analyses are presented in Appendix A.

An inventory of types and estimated quantities of identified ACM, by building and abatement cost estimates, are presented in Table 2.

#### 2.0 DISCUSSION OF RESULTS

#### 2.1 SITE DESCRIPTION OF THE USPCC FACILITY

The USPCC facility in Cincinnati, Ohio, consists of 14 buildings. The buildings are comprised of various types of building construction. Each room/area within each building was inspected. The inspector recorded relevant room information on an Asbestos Field Form, noting room size and suspect ACM with approximate quantities. Rooms and areas that were not accessible during the inspection were noted on the form. Asbestos Field Forms listing all the suspect ACMs in each room in each building are included in Appendix B of this report.

#### 2.2 ASBESTOS INSPECTION RESULTS

#### **ACM** Identified

The following ACM were identified (with confirmatory PLM analyses) at the USPCC facility. The following information contains brief descriptions of each ACM identified.

## **Building 1**

- Aircell-pipe insulation throughout the building
- Cemetitous fittings on fiberglass lines throughout the building
- Layered-paper pipe insulation throughout the building
- Preformed-block pipe insulation throughout the building
- · Window caulking throughout the building

#### **Building 2**

- Layered-paper pipe insulation throughout the building
- Floor tile under carpet throughout the building
- Radiator heat shields throughout the building
- Aircell-pipe insulation throughout the building
- Window caulking and glazing throughout the building

#### Building 3

- 12 in. x 12 in. floor tile throughout the building
- Preformed-block pipe insulation throughout the building
- · Layered-paper pipe insulation throughout the building
- Window caulking throughout the building

#### **Building 4**

- Preformed-block pipe insulation throughout the building
- Aircell-pipe insulation throughout the building
- 9 in. x 9 in. and 12 in. x 12 in. floor tile throughout the building

Window caulking throughout the building

#### **Building 5**

- Aircell-pipe insulation throughout the building
- Layered-paper pipe insulation throughout the building

#### **Building** 6

Preformed-block pipe insulation throughout the building

#### Building 6A

- 9 in. x 9 in. floor tile and floor tile under carpet throughout the building
- Layered-paper pipe insulation throughout the building
- Tarred tape pipe wrap insulation throughout the building
- Preformed-block pipe insulation throughout the building
- Aircell-pipe insulation throughout the building
- Lining of radiator cover throughout the building

#### Building 7

- 9 in. x 9 in. and 12 in. x 12 in. floor tile throughout the building
- Linoleum throughout the building
- Preformed-block pipe insulation throughout the building
- Aircell-pipe insulation throughout the building
- Window caulking throughout the building
- Layered-paper pipe insulation throughout the building
- Tarred tape pipe wrap insulation throughout the building
- Aircell-duct insulation throughout the building

#### **Building 8**

- Aircell-pipe insulation throughout the building
- Window caulking throughout the building

#### **Building 9**

- Preformed-block tank insulation
- Preformed-block pipe insulation throughout the building
- Layered-paper pipe insulation throughout the building
- Transite panel
- Caulking on boilers
- Preformed brick on boilers
- Preformed-block insulation on boiler breeching inside and outside the building
- Boiler door gasket
- Window caulking throughout the building

#### **Building 10**

Aircell-pipe insulation throughout the building

Window caulking throughout the building

## **Building 13**

Window caulking throughout the building

#### **Building 15**

• Aircell-pipe insulation throughout the building

#### **Building 18**

Window glazing throughout the building

The locations of all ACM at the USPCC are shown on building floor plans.

#### Non-ACM Identified

Asbestos was not detected by PLM analysis in the following suspect materials:

## **Building 1**

- 12 in. x 12 in. gray with white blotches floor tile
- 12 in. x 12 in. gray with gray and white blotches floor tile
- 12 in. x 12 in. gray with tan blotches floor tile
- 2 ft. x 4 ft. suspended ceiling tile with random fissures
- 2 ft. x 4 ft. suspended ceiling tile with dot pattern
- · Fiberboard inside dryers on the 4th floor
- Hard plaster walls
- Drywall joint compound
- Window glazing

#### **Building 2**

- Drywall joint compound
- 12 in. x 12 in. gray marbled floor tile
- 15 in. x 15 in. white with black and gray spots floor tile
- 15 in. x 15 in. dark gray with black and gray spots floor tile
- White linoleum floor covering with pebble pattern
- 12 in. x 12 in. acoustical ceiling tiles with dot pattern
- 2 ft. x 2 ft. suspended ceiling tiles with random fissures
- 2 ft. x 4 ft. suspended ceiling tiles with random fissures
- 12 in. x 12 in. acoustical ceiling tiles with deep fissures
- 12 in. x 12 in. acoustical ceiling tiles with random dot pattern
- 15 in. x 15 in. acoustical ceiling tile with smooth finish

#### **Building 3**

- 12 in. x 12 in. gray with gray and white blotches floor tile
- 12 in. x 12 in. beige with tan and white blotches floor tile

- 12 in. x 12 in. gray with white blotches floor tile
- 12 in. x 12 in. dark gray with white blotches floor tile
- Hard plaster walls
- Fiberboard ceiling
- Cementitous fittings on fiberglass lines
- Drywall joint compound
- 2 ft. x 4 ft. suspended ceiling panels with random fissures
- 2 ft. x 4 ft. suspended ceiling panels with dot pattern
- 2 ft. x 4 ft. suspended ceiling panels with smooth finish, drywall panels
- 12 in. x 12 in. acoustical ceiling tiles with indented pattern
- Green speckled linoleum floor covering
- Window glazing

## **Building 4**

- 12 in. x 12 in. acoustical ceiling tiles with slots and associated mastic (hockey pucks)
- 12 in. x 12 in. acoustical ceiling tiles with dot pattern
- Hard plaster
- Fiberboard
- Window glazing

## **Building 5**

- Hard plaster
- Drywall/joint compound

#### **Building** 6

- Drywall/joint compound
- Hard plaster
- 12 in. x 12 in. acoustical ceiling tiles with smooth finish

#### Building 6A

- 12 in. x 12 in. gray with blue and white spots floor tile
- 12 in. x 12 in. white with black streaks floor tile
- 12 in. x 12 in. 23 acoustical ceiling tiles with dot pattern
- Hard plaster
- 20 in. x 20 in. acoustical ceiling tiles with smooth finish
- 2 ft. x 2 ft. suspended ceiling tiles with rough texture
- 12 in. x 12 in. acoustical ceiling tile with random dots
- 2 ft. x 4 ft. suspended ceiling panels with random fissures
- Cementitous fittings on fiberglass lines
- Window glazing

#### Building 7

- 12 in. x 12 in. acoustical ceiling tile with slot pattern
- 2 ft. x 4 ft. suspended ceiling panels with random fissures
- 12 in. x 12 in. acoustical ceiling tile with deep fissures

- 12 in. x 12 in. acoustical ceiling panels, lateral fissures
- 2 ft. x 4 ft. suspended ceiling tiles with lateral fissure
- 12 in. x 12 in. acoustical ceiling tiles with dot pattern
- Hard plaster
- Mastic on acoustical ceiling tiles (hockey pucks)
- Drywall/joint compound (confirmed by point-count analysis of composite sample)
- Window glazing

#### **Building 8**

Window glazing

#### **Building 9**

- Fittings on fiberglass lines
- Window glazing

#### **Building 10**

- 2 ft. x 4 ft. suspended ceiling panels with long random fissures
- 2 ft. x 4 ft. suspended ceiling panels with small deep random fissures
- 2 ft. x 4 ft. suspended ceiling panels with a smooth finish
- Window glazing

## **Building 13**

- Window glazing
- Building 15
- Rolled in building insulation
- Drywall/joint compound

#### **Building 18**

Window glazing

#### 3.0 RECOMMENDATIONS AND ABATEMENT COST ESTIMATES

#### 3.1 ASBESTOS-CONTAINING MATERIALS

The condition of the ACM material was rated on a scale of: good, damaged, or significantly damaged. Most ACM found in all buildings was in good to damaged condition. The following notes regarding damaged or significantly damaged ACM were made by the inspector for the following buildings:

#### All Buildings

The condition of window caulking around the windows of most buildings ranged from good to significantly damaged condition. BHE recommends that a licensed asbestos abatement contractor or asbestos trained renovation contractor repair the damaged caulking on windows with significant damage.

#### **Tunnels**

The inspector noted aircell pipe insulation debris in the tunnels from Building 1 to Building 9 and from Buildings 7 to Building 9. BHE recommends that a licensed abatement contractor clean up the debris and repair the damaged pipe insulation in the tunnels.

#### Overhead Walkway

The inspector noted 63 linear feet of significantly damaged layered-paper pipe insulation on the overhead walkway between Buildings 3 and 9.

## **Building 1**

Approximately 25 linear feet of damaged pipe insulation was noted by the inspector in Room 2 behind the cooker machine. This insulation is in an area occupied by employees that operate the cooker machine. BHE recommends that a licensed asbestos abatement contractor repair or remove this damaged pipe insulation.

#### **Building 2**

The inspector noted approximately 150 linear feet of damaged layered-pipe insulation in Building 2, Room 41 on the first floor, and 30 linear feet in Room 8 on the fourth floor. BHE recommends that a licensed asbestos abatement contractor repair or remove this damaged pipe insulation.

#### **Building 3**

The inspector noted damaged layered-paper-pipe insulation in the following locations:

- Approximately 20 linear feet of damaged layered pipe insulation in Room 46 on the first floor
- Approximately 10 linear feet in Rooms 56/57 on the third floor
- Approximately 5 linear feet in Room 52 on the fourth floor

BHE recommends that a licensed asbestos abatement contractor repair or remove this damaged pipe insulation.

## **Building 4**

The inspector noted approximately 250 square feet of damaged floor tile in Room 11 on the first floor. BHE recommends that a licensed asbestos abatement contractor remove the damaged floor tile. The inspector noted approximately 10 linear feet of damaged preformed-block pipe insulation in Room 7 on the second floor. BHE recommends that a licensed asbestos abatement contractor repair the damaged piping.

## **Building 6A**

The inspector noted damaged layered-paper pipe insulation in the following locations:

- Approximately 20 linear feet of in Room 48 on the first floor
- Approximately 10 linear feet in Room 46 of the first floor

The inspector noted significantly damaged layered-paper pipe insulation in the following location:

Approximately 30 linear feet of layered pipe insulation in Room 4 on the third floor

The inspector noted significant damage on aircell pipe insulation in the following locations:

- Approximately 20 linear feet of aircell-pipe insulation in Room 46 of the first floor
- Approximately 30 linear feet of aircell-pipe insulation in Room 4 on the third floor

BHE recommends that a licensed asbestos abatement contractor repair or remove the damaged pipe insulation.

## **Building 7**

The inspector noted significantly damaged floor tile in the following locations:

- Approximately 1,125 square feet Room 1 in the basement
- Approximately 70 square feet in Room 41 on the first floor
- Approximately 150 square feet of damaged tile in Room 76 on the first floor
- Approximately 40 linear feet in Room 26 on the second floor
- Approximately 2000 square feet of floor tile in Room 20 on the third floor. The inspector noted that the floor tile was being run over daily by hand trucks.

BHE recommends that a licensed asbestos abatement contractor remove the damaged floor tile. The inspector noted damaged preformed-block pipe insulation in the following locations:

- Approximately 15 linear feet of damaged was found in Room 12
- Approximately 80 linear feet in Room 15 of the first floor
- Approximately 10 linear feet in Room 22 of the third floor

The inspector noted damaged layered-paper pipe insulation in the following locations:

 Approximately 10 linear feet of damaged layered-pipe insulation in Room 26 on the second floor

BHE recommends that a licensed asbestos contractor repair or remove the damaged insulation.

## Building 8×

The inspector noted damaged aircell-pipe insulation in Building 8 (abandoned and unoccupied building). Pipe insulation was seen on the dirt floor of the crawl space on the west end of the building. The damaged insulation was wet apparently from water that has leaked through the damaged roof. BHE understands that USPCC is considering demolishing this building. State regulations require that all regulated ACM be removed prior to the building being demolished. BHE recommends that a licensed asbestos abatement contractor remove RACM prior to building demolition.

# Building 9 📈

The inspector noted Building 9 (Powerhouse) with having the most damaged ACM material. Tanks with preformed-block insulation and insulated piping in the building are significantly damaged. Tank insulation was exposed without jacketing and insulation debris from some tanks was lying on the floor. Pipe insulation was also exposed in some areas with insulation lying on the floor. Preformed-block insulation debris from boilers was also found in Building 9. Photographs depicting some of the damaged ACMs in Building 9 were taken and presented in Appendix C. The inspectors recommend this building receive top priority for corrective action. BHE recommends that a licensed asbestos abatement contractor cleanup, remove, or repair the damaged ACM in Building 9. All significantly damaged ACM should be removed (ie., non-repairable).

## Buildings 15 & 18 💃

Damaged and significantly damaged aircell-pipe insulation was identified in Buildings 15 and 18. The inspector noted that most insulation from the piping was on the ground. BHE recommends that a licensed asbestos abatement contractor cleanup the pipe insulation debris.

#### Asphalt-based Roofing Material, Floor Tile, and Mastic ✓

Asphalt-based roofing materials and resilient floor coverings, such as floor tile and linoleum, are considered nonfriable when in good condition and not damaged. Currently, asbestos-containing asphalt-based roofing and resilient floor coverings such as floor tile, in good condition, are not considered regulated asbestos-containing material (RACM) per revised EPA National Emission Standards for Hazardous Air Pollutants (NESHAP) regulations of November 20, 1990. This is because the asbestos fibers are tightly bound in an asphalt or vinyl matrix and are not readily released into the air. Nonfriable asbestos-containing roofing and floor tile are classified as "Category I nonfriable ACM."

The State of Ohio does not require that these materials be removed from buildings prior to demolition. However, any renovation activities that would subject the ACM to abrasive forces (such as sanding, cutting, or grinding) could render the ACM friable and, therefore, result in the floor tile and or roofing becoming RACM subject to the NESHAP regulations.

When planning renovation activities, asbestos-containing roofing materials, linoleum, and floor tile and mastic should be considered carefully to ensure that they are not disturbed. If these materials will be affected by subsequent renovation, they should be removed properly by specially trained and equipped workers (usually a licensed asbestos abatement contractor) before construction or interior demolition work begins. Although a licensed asbestos abatement contractor is not required for the removal of Category I nonfriable materials (provided they are non-friable and in good condition), contractors working with these materials must comply with the OSHA asbestos standard for the construction industry (29 CFR 1926.1101) which has specific training requirements and work practices for construction or maintenance work involving the removal of Category I nonfriable materials.

The estimated asbestos removal costs presented in Table 3 are based on the estimated quantities of ACM and an average of current unit-price quotations from local asbestos abatement

contractors. The estimate is provided as an indication of typical costs for asbestos abatement and is intended for use as a planning tool. Actual bid prices from contractor for asbestos removal can be extremely variable.

Qualified independent third party industrial hygienists and project monitors are recommended to oversee contractor performance and to ensure that the asbestos is removed in a safe and compliant manner and disposed properly in accordance with the project specifications and applicable federal, state, and local asbestos regulations. A rough "ball park" estimate for third party oversight and air monitoring is also presented; however, actual costs for third party oversight will depend on the project schedule and scope, length and number of work shifts, and the duration of the abatement project.

## **Employee Training Including Operations and Maintenance Work**

Currently, the OSHA asbestos standard for the construction industry (29 CFR 1926.1101) defines four classes of work involving ACM and has specific training requirements for each class.

Removal of asbestos-containing thermal system insulation or surfacing materials is considered "Class I asbestos work." OSHA requires that employees performing Class I operations receive the four-day EPA AHERA asbestos abatement worker training. Class I asbestos work should be conducted by a licensed asbestos abatement contractor.

Removal of asbestos-containing wallboard, resilient floor coverings, roofing and siding shingles, and construction mastics is considered "Class II asbestos work." OSHA requires that employees performing Class II operations also receive the four-day EPA AHERA asbestos abatement worker training.

Repair and maintenance operations, where thermal system insulation and surfacing material is likely to be disturbed, are considered "Class III asbestos work," OSHA requires that employees performing Class III operations receive the EPA 16-hour Operations and Maintenance (O&M) training course, including hands-on training on respirators and work practices.

Maintenance and custodial activities during which employees contact ACM (but do not disturb it) and activities to clean up waste and debris containing ACM are considered "Class IV asbestos work." OSHA requires that employees performing Class IV operations receive the EPA two-

hour awareness training. This course should include instruction on the locations of ACM and on the recognition of damage, deterioration, or delamination of ACM. Class IV work must be overseen by a competent person who has received at least the two-day O&M training course.

BHE recommends that any workers performing Class II, III, or IV operations receive the appropriate training to reduce the risk of worker or occupant exposure to asbestos fibers during routine or emergency maintenance operations.

# **FIGURES** Drawings Showing ACM Sample Location

## **TABLES**

- 1 Bulk Data Summary of Suspect ACM
- 2 Inventory of ACM
- 3 Abatement Cost Estimate for ACM

I.D.	SAMPLED MATERIAL	% ASBESTOS
	in al deliver the	
USPC-1-69	Aircell Pipe Insulation (grayish tan, with black felt)	15.0% Chrysotile
USPC-1-70		NA
USPC-1-92		NA
USPC-1-72	2x4 Suspended Ceiling Panel, Random Fissures (white)	ND
USPC-1-80		ND
USPC-1-86	2'x4' Suspended ceiling panels with dot pattern (white)	ND
USPC-1-87		ND
USPC-1-73	Fitting on Fiberglass Line (white, with foil/paper/woven wrap)	ND
USPC-1-78		ND
USPC-1-89		20.0% Chrysotile
USPC-1-77	Preformed Block Pipe Insulation (white, with woven wrap)	ND
USPC-1-90		25.0% Chrysotile 5.0% Crocidolite
USPC-1-97		NA
USPC-1-79	Layered Paper Pipe Insulation (grayish tan, with black felt)	5.0% Chrysotile
USPC-1-91		NA
USPC-1-81*	Fiberboard (2 parts)	ND
USPC-1-81 (A)	Tan fiberboard	ND
USPC-1-81 (B)	Silver paint	ND ND
USPC-1-82*	Fiberboard (2 parts)	ND
USPC-1-82 (A)	Tan fiberboard	ND
USPC-1-82 (B)	Silver paint	ND
USPC-1-93*	Drywall/joint compound (3 parts)	ND
USPC-1-93 (A)	White drywall	ND
USPC-1-93 (B)	White joint compound	ND
USPC-1-93 (C)	White tape	ND
USPC-1-103*	Drywall/joint compound (3 parts)	ND
USPC-1-103 (A)	White drywall	ND
USPC-1-103 (B)	White joint compound	ND
USPC-1-103 (C)	White tape	ND

I.D.	SAMPLED MATERIAL	% ASBESTOS
USPC-1-84*	12"x12" Gray with gray & white blotches (2 parts)	ND
USPC-1-84 (A)	White floor tile	ND
USPC-1-84 (B)	Tan mastic	ND
USPC-1-95*	12"x12" Gray with gray & white blotches (2 parts)	ND
USPC-1-95 (A)	White floor tile	ND
USPC-1-95 (B)	Tan mastic	ND
USPC-1-94*	12"x12" floor tile, gray with white blotches (2 parts)	ND
USPC-1-94 (A)	Gray floor tile	ND
USPC-1-94 (B)	Tan mastic	ND
USPC-1-98*	12"x12" floor tile, white with tan blotches (2 parts)	ND
USPC-1-98 (A)	White floor tile	ND
USPC-1-98 (B)	Tan mastic	ND
USPC-1-99*	12"x12" floor tile, white with tan blotches (2 parts)	ND
USPC-1-99 (A)	White floor tile	ND
USPC-1-99 (B)	Tan mastic	ND
USPC-1-101*	12"x12" floor tile gray with white blotches (2 parts, sample inconsistent with previous sample)	ND
USPC-1-101 (A)	Gray floor tile	ND
USPC-1-101 (B)	Black mastic	ND
USPC-1-104	Hard plaster wall (white)	ND
USPC-1-105	Hard plaster wall (white)	ND
USPC-1-106	Hard plaster wall (white)	ND
USPC-1-107	Layered paper pipe insulation (group method)	NA
USPC-1-410	Window glazing (tannish white)	ND
USPC-1-411	Window caulking (brown)	5.0% Chrysotile
USPC-1-413	Window caulking (group method)	NA
USPC-1-414	Window glazing (tannish white)	Tr < 1.0% Chrysotile
	383040XG <i>6</i> 2	
USPC-2-354*	Layered paper pipe insulation (3 parts)	ND
USPC-2-354 (A)	Tan insulation	ND

I.D.	SAMPLED MATERIAL	% ASBESTOS
USPC-2-354 (B)	Black felt	ND
USPC-2-354 (C)	Gray painted wrap	ND
USPC-2-356*	Layered paper pipe insulation (3 parts)	7.8% Chrysotile
USPC-2-356 (A)	Gray insulation	ND
USPC-2-356 (B)	Black felt	65.0% Chrysotile
USPC-2-356 (C)	White painted wrap	ND ·
USPC-2-387*	Layered paper pipe insulation (2 parts)	ND
USPC-2-387 (A)	Gray tan insulation	ND
USPC-2-387 (B)	Gray painted wrap	ND
USPC-2-355*	Drywall/joint compound	ND
USPC-2-355 (A)	White/tan drywall	ND
USPC-2-355 (B)	White joint compound with woven tape and paint	ND
USPC-2-398*	Drywall/joint compound	ND
USPC-2-398 (A)	White/tan drywall	ND
USPC-2-398 (B)	White joint compound with paint	ND
USPC-2-400*	Hard plaster (2 parts)	ND
USPC-2-400 (A)	Gray plaster	ND
USPC-2-400 (B)	White plaster	ND
USPC-2-417	Window caulking (brown)	25.0% Chrysotile
USPC-2-418	Window glazing (off-white)	10.0% Chrysotile
USPC-2-420	Window glazing (group method)	NA
USPC-2-421	Window caulking (group method)	NA
USPC-2-358*	12"x12" gray marbled floor tile (2 parts)	ND_
USPC-2-358 (A)	Gray floor tile	ND
USPC-2-358 (B)	Yellow mastic	ND
USPC-2-360*	15"x15" floor tile, white with black and gray spots (2 parts)	ND
USPC-2-360 (A)	Grayish white vinyl flooring	ND
USPC-2-360 (B)	Clear mastic	ND
USPC-2-361*	15"x15" floor tile, white with black and gray spots (2 parts)	ND
USPC-2-361 (A)	Grayish white vinyl flooring	ND
USPC-2-361 (B)	Clear mastic	ND
USPC-2-363*	15"x15" floor tile, dark gray with black and gray spots (2 parts)	ND

I.D.	SAMPLED MATERIAL	% ASBESTOS
USPC-2-363 (A)	Gray/white speck rubber flooring	ND
USPC-2-363 (B)	Clear mastic	ND
USPC-2-364*	15"x15" floor tile, dark gray with black and gray spots (2 parts)	ND
USPC-2-364 (A)	Gray/white speck rubber flooring	ND
USPC-2-364 (B)	Clear mastic	ND
USPC-2-366*	Unknown floor tile under carpet (3 parts)	38.3% Chrysotile
USPC-2-366 (A)	Green floor tile	40.0% Chrysotile
USPC-2-366 (B)	Black mastic	10.0% Chrysotile
USPC-2-366 (C)	Tan mastic	ND
USPC-2-368*	Unknown floor tile under carpet (3 parts)	39.0% Chrysotile
USPC-2-368 (A)	Green floor tile	40.0% Chrysotile
USPC-2-368 (B)	Black mastic	8.0% Chrysotile
USPC-2-368 (C)	Tan mastic	ND
USPC-2-391*	9"x9" floor tile, brown with white and brown streaks (2 parts)	20.1% Chrysotile
USPC-2-391 (A)	Dark brown floor tile	20.0% Chrysotile
USPC-2-391 (B)	Black mastic	25.0% Chrysotile
USPC-2-392	9"x9' floor tile, brown with white and brown streaks (group method)	NA
USPC-2-394*	12"x12" floor tile, gray marbled (2 parts)	ND
USPC-2-394 (A)	Gray floor tile	ND
USPC-2-394 (B)	Tan mastic	ND
USPC-2-407*	Linoleum, white pebble pattern (2 parts)	ND
USPC-2-407 (A)	Beige/off-white pebble linoleum)	ND
USPC-2-407 (B)	Tan mastic with black material	ND
USPC-2-408*	Linoleum, white pebble pattern (2 parts)	ND
USPC-2-408 (A)	White pebble linoleum	ND_
USPC-2-408 (B)	Tan mastic with black material	ND
USPC-2-371	Fitting on fiberglass line (grayish white insulation with woven wrap	ND
USPC-2-405		ND
USPC-2-406		ND
USPC-2-372	Radiator heat shield (white ins.)	75.0% Chrysotile
USPC-2-373	Radiator heat shield (group method)	NA

I,D.	SAMPLED MATERIAL	% ASBESTOS
USPC-2-374	Radiator heat shield (group method)	NA
USPC-2-375	12"x12" acoustical ceiling tile, dot pattern (white/tan)	ND
USPC-2-376		ND
JSPC-2-378	2'x4' suspended ceiling panels, random fissure (white/gray)	ND
USPC-2-396		· ND
JSPC-2-379	12'x12" acoustical ceiling tiles, deep fissures (white)	ND
JSPC-2-395		ND
JSPC-2-381	12"x12" acoustical ceiling tile, random dot pattern (white/tan)	ND
USPC-2-382		ND
JSPC-2-384	15"x15" acoustical ceiling tile, smooth finish (white/tan)	ND
USPC-2-385		ND ND
JSPC-2-388	2'x2' suspended ceiling panels, random fissures (white/gray)	ND
USPC-2-389		ND
JSPC-2-357	Aircell pipe insulation (white painted)	65.0% Chrysotile
JSPC-2-369		NA
JSPC-2-370		NA
JSPC-2-400*	Hard Plaster (2 parts)	ND
USPC-2-400 (A)	Gray plaster	ND
USPC-2-400 (B)	White plaster	ND
USPC-2-401*	Hard plaster (2 parts)	ND
USPC-2-401 (A)	Gray plaster	ND
JSPC-2-401 (B)	White plaster	ND
JSPC-2-402*	Hard plaster (2 parts)	ND
USPC-2-402 (A)	Gray plaster	ND
USPC-2-402 (B)	White plaster	ND
USPC-2-403*	Hard plaster (2 parts)	ND
JSPC-2-403 (A)	Gray plaster	ND
USPC-2-403 (B)	White plaster	ND
USPC-2-404*	Hard plaster (2 parts)	ND
USPC-2-404 (A)	Gray plaster	ND
USPC-2-404 (B)	White plaster	ND

I.D.	SAMPLED MATERIAL	% ASBESTOS
	Rulibiks ##	
USPC-3-108*	12"x12" floor tile, gray with white blotches (2 parts)	ND
USPC-3-108 (A)	Gray/blue floor tile	ND
USPC-3-108 (B)	Yellow mastic	ND
USPC-3-114*	12"x12" floor tile, gray with white blotches (2 parts)	ND .
USPC-3-114 (A)	Gray/blue floor tile	ND
USPC-3-114 (B)	Yellow mastic	ND
USPC-3-129*	12"x12" floor tile, beige with brown and white spots (2 parts)	19.8% Chrysotile
USPC-3-129 (A)	Tan floor tile	20.0% Chrysotile
USPC-3-129 (B)	Tan mastic	ND
USPC-3-130*	12"x12" floor tile, beige with brown and white spots (2 parts)	19.8% Chrysotile
USPC-3-130 (A)	Tan floor tile	20.0% Chrysotile
USPC-3-130 (B)	Tan mastic	ND
USPC-3-135*	12"x12" floor tile, beige with tan and white blotches (2 parts)	ND
USPC-3-135 (A)	Tan floor tile	ND
USPC-3-135 (B)	Tan mastic	ND
USPC-3-136*	12"x12" floor tile, beige with tan and white blotches (2 parts)	ND
USPC-3-136 (A)	Tan floor tile	ND
USPC-3-136 (B)	Tan mastic	ND
USPC-3-138*	12"x12" floor tile, blue with black and white streaks (2 parts)	2.0% Chrysotile
USPC-3-138 (A)	Blue floor tile	2.0% Chrysotile
USPC-3-138 (B)	Tan mastic	ND
USPC-3-139*	12"x12" floor tile, blue with black and white streaks (2 parts)	2.0% Chrysotile
USPC-3-139 (A)	Blue floor tile	2.0% Chrysotile
USPC-3-139 (B)	Tan mastic	ND
USPC-3-141*	12"x12" floor tile, gray with white blotches (2 parts)	ND
USPC-3-141 (A)	Blue floor tile	ND
USPC-3-141 (B)	Tan mastic	ND
USPC-3-142*	12"x12" floor tile, gray with white blotches (2 parts)	ND

I.D.	SAMPLED MATERIAL	% ASBESTOS
USPC-3-142 (A)	Tan floor tile	ND
USPC-3-142 (B)	Tan mastic	ND
USPC-3-151*	12"x12" floor tile, gray with white blotches (2 parts)	ND
USPC-3-151 (A)	Gray floor tile	ND
USPC-3-151 (B)	Tan mastic	ND
USPC-3-112*	Hard plaster wall (2 parts)	ND .
USPC-3-112 (A)	Gray plaster	ND
USPC-3-112 (B)	White plaster	ND
USPC-3-113*	Hard plaster wall (2 parts)	ND
USPC-3-113 (A)	Gray plaster	ND
USPC-3-113 (B)	White plaster	ND
USPC-3-132	Fiberboard (tan)	ND
USPC-3-133	Fiberboard (tan)	ND
USPC-3-111*	Preformed block pipe insulation (2 parts)	9.0% Amosite 9.0% Chrysotile
USPC-3-111 (A)	White insulation	10.0% Amosite 10.0% Chrysotile
USPC-3-111 (B)	Tan woven mat	ND
USPC-3-117*	Preformed block pipe insulation (2 parts)	9.0% Amosite 13.5% Chrysotile
USPC-3-117 (A)	White insulation	10.0% Amosite 15.0% Chrysotile
USPC-3-117 (B)	Tan woven mat	ND
USPC-3-128	Preformed block pipe insulation	10.0% Amosite 10.0% Chrysotile
USPC-3-119*	Fitting on F.G. line (2 parts)	ND
USPC-3-119 (A)	Tan insulation	ND
USPC-3-119 (B)	Tan woven mat	ND
USPC-3-120*	Fitting on fiberglass line (2 parts)	ND
USPC-3-120 (A)	Tan insulation	ND
USPC-3-120 (B)	Tan woven mat	ND
USPC-3-76	Layered paper pipe insulation (LPPI), 4 <sup>th</sup> fl. (grayish tan paper insulation with painted woven wrap)	15.0% Chrysotile
USPC-3-122	Layered paper pipe insulation (tan)	ND
USPC-3-123*	LPPI (2 parts)	9.0% Chrysotile
USPC-3-123 (A)	Tan paper insulation	ND
USPC-3-123 (B)	Gray paper insulation	30.0% Chrysotile

I.D.	SAMPLED MATERIAL	% ASBESTOS
USPC-3-118*	Drywall/joint compound (3 parts)	ND
USPC-3-118 (A)	White drywall	ND
USPC-3-118 (B)	White joint compound	ND
USPC-3-118 (C)	White drywall tape	ND
USPC-3-124*	Drywall/joint compound	ND
USPC-3-124 (A)	White drywall	ND
USPC-3-124 (B)	White joint compound	ND
USPC-3-124 (C)	White drywall tape	ND
USPC-3-125*	Hard plaster wall (2 parts)	, ND
USPC-3-125 (A)	Gray plaster	ND
USPC-3-125 (B)	White plaster	ND
USPC-3-126*	Hard plaster wall (2 parts)	ND
USPC-3-126 (A)	Gray plaster	ND
USPC-3-126 (B)	White plaster	ND
USPC-3-127*	Hard plaster wall (2 parts)	ND
USPC-3-127 (A)	Gray plaster	_ND
USPC-3-127 (B)	White plaster	ND
USPC-3-109	2'x4' suspended ceiling panels, random fissures (white/gray)	ND
USPC-3-121		ND
USPC-3-144	2'x4' Suspended ceiling panels, dot pattern (white)	ND
USPC-3-145		ND
USPC-3-156	2'x4' Suspended ceiling panels, lateral fissure (white)	ND
USPC-3-157		ND
USPC-3-147	12"x12" Acoustical ceiling tile, indented pattern (tan)	ND
USPC-3-148		ND
USPC-3-150*	12"x12" floor tile, gray with white blotches (2 parts)	ND
USPC-3-150 (A)	Gray floor tile	ND
USPC-3-150 (B)	Tan mastic	ND
USPC-3-153*	Linoleum floor covering, green speckled pattern (2 parts)	ND
USPC-3-153 (A)	Gray linoleum	ND
USPC-3-153 (B)	Tan mastic	ND

I.D.	SAMPLED MATERIAL	% ASBESTOS
USPC-3-154*	Linoleum floor covering, green speckled pattern (2 parts)	ND
USPC-3-154 (A)	Gray linoleum	ND
USPC-3-154 (B)	Tan mastic	ND
USPC-3-422_	Window glazing (of-white)	Tr <1.0% Chrysotile
USPC-3-423	Window caulking (white)	_ ND
USPC-3-424	Window glazing (white)	ND
USPC-3-425	Window caulking (brown)	15.0% chry
	BOILDING #4	
USPC-4-74	Performed block pipe insulation, 4 <sup>th</sup> fl. (white fibrous insulation with painted woven wrap)	35.0% Chrysotile
USPC-4-75	Layered paper pipe insulation, 4 <sup>th</sup> fl. (tan paper insulation with painted woven wrap)	20.0% Chrysotile
USPC-4-191*	Aircell pipe insulation. (2 parts)	58.5% Chrysotile
USPC-4-191 (A)	White felt	65.0% Chrysotile
USPC-4-191 (B)	White woven wrap	ND
USPC-4-195*	Aircell pipe insulation (2 parts)	51.0% Chrysotile
USPC-4-195 (A)	White felt	60.0% Chrysotile
USPC-4-195 (B)	White woven wrap	ND
USPC-4-196*	Aircell P.I. (2 parts)	58.5% Chrysotile
USPC-4-196 (A)	White felt	65.0% Chrysotile
USPC-4-196 (B)	White woven wrap	ND
USPC-4-175	12"x12" Acoustical ceiling tiles with dot pattern	ND
USPC-4-176		ND
USPC-4-185	12"x12" Acoustical ceiling tile with slots	ND
USPC-4-186		ND
USPC-4-183	Ceiling tiles on walls (white)	ND
USPC-4-184	Ceiling tiles on walls (white)	, ND
USPC-4-188*	Mastic on 12"x12" Acoustical ceiling tiles with slots (hockey pucks) (2 parts)	ND
USPC-4-188 (A)	Brown mastic	ND
USPC-4-188 (B)	Tan ceiling tile	ND
USPC-4-189*	Mastic on 12"x12" Acoustical ceiling tiles with slots (hockey pucks) (2 parts)	ND
USPC-4-189 (A)	Brown mastic	ND

I.D.	SAMPLED MATERIAL	% ASBESTOS
USPC-4-189 (B)		, ND
USPC-4-178*	9"x9" Floor tile, gray with black and white streaks (3 parts)	35.7% Chrysotile
USPC-4-178 (A)	Gray floor tile	40.0% Chrysotile
USPC-4-178 (B)	Black felt	ND
USPC-4-178 (C)	Black mastic	10.0% Chrysotile
USPC-4-179*	9"x9" Floor tile, gray with black and white streaks (3 parts)	36.6% Chrysotile
USPC-4-179 (A)	Gray floor tile	40.0% Chrysotile
USPC-4-179 (B)	Black felt	ND
USPC-4-179 (C)	Black mastic	15.0% Chrysotile
USPC-4-197*	12"x 12" Floor tile, blue with blue and black streaks (2 parts)	5.9% Chrysotile
USPC-4-197 (A)	Blue floor tile	6.0% Chrysotile
USPC-4-197 (B)	Black mastic	ND
USPC-4-198*	12"x 12" Floor tile, blue with blue and black streaks (2 parts)	7.9% Chrysotile
USPC-4-198 (A)	Blue floor tile	8.0% Chrysotile
USPC-4-198 (B)	Black mastic	ND
USPC-4-181*	Hard plaster (2 parts)	ND
USPC-4-181 (A)	Gray/white material	ND
USPC-4-181 (B)	White material	ND
USPC-4-182*	Hard plaster (2 parts)	ND
USPC-4-182 (A)	Gray/white material	ND
USPC-4-182 (B)	White material	ND
USPC-4-192*	Hard plaster (2 parts)	ND
USPC-4-192 (A)	Gray/white material	ND
USPC-4-192 (B)	White material	ND
USPC-4-193*	Hard plaster (2 parts)	ND
USPC-4-193 (A)	Gray/white material	ND
USPC-4-193 (B)	White material	ND
USPC-4-194*	Hard plaster (3 parts)	ND
USPC-4-194 (A)	Gray/white material	ND
USPC-4-194 (B)	White material	ND
USPC-4-194 (C)	Tan sand plaster	15.0% Chrysotile
USPC-4-200	Fiberboard (tan)	ND

I.D.	SAMPLED MATERIAL	% ASBESTOS
USPC-4-201	Fiberboard (tan)	ND
USPC-4-429	Window caulking (brown)	8.0% Chrysotile
USPC-4-430	Window glazing (white)	ND
USPC-4-431	Window caulking (group method)	NA
USPC-4-432	Window glazing (white)	ND
	EDITORS (IS	
USPC-5-159	Hard plaster ceiling (tan sand plaster)	Tr <1.0% Chrysotile
USPC-5-160	Hard plaster ceiling (tan sand plaster)	Tr <1.0% Chrysotile
USPC-5-161	Hard plaster ceiling (tan sand plaster)	Tr <1.0% Chrysotile
USPC-5-162	Hard plaster ceiling (white sand plaster)	Tr <1.0% Chrysotile
USPC-5-165	Hard plaster ceiling (tan sand plaster)	Tr <1.0% Chrysotile
USPC-5-166	Hard plaster ceiling (white sand plaster)	ND
USPC-5-167	Hard plaster ceiling (tan sand plaster)	Tr <1.0% Chrysotile
USPC-5-163	Aircell P.I. (white)	45.0% Chrysotile
USPC-5-168	Aircell P.I. (group method)	NA
USPC-5-170*	Aircell P.I. (2 parts)	40.5% Chrysotile
USPC-5-170 (A)	White fibrous insulation	45.0% Chrysotile
USPC-5-170 (B)	White woven wrap	ND
USPC-5-164*	Drywall joint compound (3 parts)	ND
USPC-5-164 (A)	White drywall	ND
USPC-5-164 (B)	White joint compound	ND
USPC-5-164 (C)	Blue woven mat	ND
USPC-5-173*	Drywall joint compound (2 parts)	ND
USPC-5-173 (A)	White drywall	ND
USPC-5-173 (B)	White joint compound	ND
USPC-5-169*	Layered paper pipe insulation (2 parts)	14.0% Chrysotile
USPC-5-169 (A)	Tan paper insulation	ND
USPC-5-169 (B)	Black paper insulation	70.0% Chrysotile
USPC-5-171*	Layered paper pipe insulation (2 parts)	7.0% Chrysotile
USPC-5-171 (A)	Tan paper insulation	ND
USPC-5-171 (B)	Black paper insulation	ND
USPC-5-172	Layered paper pipe insulation (tan)	ND
	Bin dingage	
USPC-6-203*	Drywall/joint compound	ND
USPC-6-203 (A)	White drywall	ND

I.D.	SAMPLED MATERIAL	% ASBESTOS
USPC-6-203 (B)	White joint compound	ND
USPC-6-204*	Drywall/joint compound	ND
USPC-6-204 (A)	White drywall	ND
USPC-6-204 (B)	White joint compound	ND
USPC-6-206*	Hard plaster (3 parts)	ND
USPC-6-206 (A)	White plaster	ND
USPC-6-206 (B)	White material	ND
USPC-6-206 (C)	White material	ND
USPC-6-207*	Hard plaster (2 parts)	ND
USPC-6-207 (A)	Gray sand plaster	ND
USPC-6-207 (B)	White plaster	ND
USPC-6-208*	Hard plaster (3 parts)	ND
USPC-6-208 (A)	Gray vermiculitic plaster	ND
USPC-6-208 (B)	White plaster	ND
USPC-6-208 (C)	Tan mastic	ND
USPC-6-209	Hard plaster (gray vermiculitic plaster)	ND
USPC-6-210*	Hard plaster (2 parts)	ND
USPC-6-210 (A)	White plaster	ND
USPC-6-210 (B)	Gray vermiculitic plaster	ND
USPC-6-211	12"x12" Acoustical ceiling tile, smooth finish (white)	ND
USPC-6-212		ND
USPC-6-214*	Preformed block pipe insulation (2 parts)	8.0% Amosite 24.0% Chrysotile
USPC-6-214 (A)	White fibrous insulation	10.0% Amosite 30.0% Chrysotile
USPC-6-214 (B)	White woven wrap	ND
USPC-6-215*	Preformed block pipe insulation (2 parts)	13.5% Amosite 18.0% Chrysotile
USPC-6-215 (A)	White fibrous insulation	15.0% Amosite 20.0% Chrysotile
USPC-6-215 (B)	White woven wrap	ND
USPC-6-216*	Preformed block pipe insulation (2 parts)	13.5% Amosite 22.5% Chrysotile
USPC-6-216 (A)	White fibrous insulation	15.0% Amosite 25.0% Chrysotile
USPC-6-216 (B)	White woven wrap	ND
USPC-6-440	Window glazing (grayish white)	ND

I.D.	SAMPLED MATERIAL	% ASBESTOS
USPC-6-441	Window caulking (brown)	8.0% Chrysotile
USPC-6-442	Window glazing (tannish white)	ND
USPC-6-443	Window caulking (group method)	NA
	BERLINESTERIOS	
USPC-6A-217	9"x9" Floor tile, painted gray (brown floor tile with gray paint and debris)	20.0% Chrysotile
USPC-6A-218	9"x9" Floor tile, painted gray (group method)	NA
USPC-6A-220*	12"x12" Floor tile, gray with blue and white spots (2 parts)	ND
USPC-6A-220 (A)	Gray/blue splotch floor tile	ND
USPC-6A-220 (B)	Yellow mastic	ND
USPC-6A-221*	12"x12" Floor tile, gray with blue and white spots (2 parts)	ND
USPC-6A-221 (A)	Gray/blue splotch floor tile	ND
USPC-6A-221 (B)	Yellow mastic	ND
USPC-6A-227*	Unknown floor tile under carpet 3 <sup>rd</sup> floor (3 parts)	19.4% Chrysotile
USPC-6A-227 (A)	Brown floor tile	20.0% Chrysotile
USPC-6A-227 (B)	Black mastic	20.0% Chrysotile
USPC-6A-227 (C)	Tan mastic	ND
USPC-6A-228*	Unknown floor tile under carpet 3 <sup>rd</sup> floor(2 parts)	19.6% Chrysotile
USPC-6A-228 (A)	Brown floor tile	20.0% Chrysotile
USPC-6A-228 (B)	Tan mastic	ND
USPC-6A-234*	Unknown floor tile under carpet 2 <sup>nd</sup> floor (3 parts)	34.0% Chrysotile
USPC-6A-234 (A)	Red floor tile	35.0% Chrysotile
USPC-6A-234 (B)	Tan mastic	ND
USPC-6A-234 (C)	Black mastic with inseparable gray material	ND
USPC-6A-235*	Unknown floor tile under carpet 2 <sup>nd</sup> floor (3 parts)	32.3% Chrysotile
USPC-6A-235 (A)	Red floor tile	33.0% Chrysotile
USPC-6A-235 (B)	Tan mastic	ND
USPC-6A-235 (C)	Black mastic with inseparable gray mastic	ND
USPC-6A-237*	9"x9" floor tile, maroon with white streaks (3 parts)	19.9% Chrysotile

I.D.	SAMPLED MATERIAL	% ASBESTOS
USPC-6A-237 (A)	Red floor tile	20.0% Chrysotile
USPC-6A-237 (B)	Black mastic	8.0% Chrysotile
USPC-6A-237 (C)	Tan mastic	ND
USPC-6A-238*	9"x9" floor tile, maroon with white streaks (2 parts)	14.9% Chrysotile
USPC-6A-238 (A)	Red floor tile	15.0% Chrysotile
USPC-6A-238 (B)	Tan mastic with inseparable gray material	ND
USPC-6A-250*	9"x9" floor tile, gray with black and white streaks (2 parts)	19.9% Chrysotile
USPC-6A-250 (A)	Brown floor tile	20.0% Chrysotile
USPC-6A-250 (B)	Black mastic	10.0% Chrysotile
USPC-6A-251	9"x9" floor tile, gray with black and white streaks (group method)	NA
USPC-6A-254*	12"x12" floor tile, white with black streaks (2 parts)	ND
USPC-6A-254 (A)	White floor tile	ND
USPC-6A-254 (B)	Black mastic	ND
USPC-6A-255*	12"x12" floor tile, white with black streaks (2 parts)	ND
USPC-6A-255 (A)	White floor tile	ND
USPC-6A-255 (B)	Tan mastic	ND
USPC-6A-223	12"x12" Acoustical ceiling tile, dot pattern (white/tan ceiling tile)	ND
USPC-6A-224	12"x12" Acoustical ceiling tile, dot pattern (white/tan ceiling tile with white paint)	ND
USPC-6A-240	20"x20" Acoustical ceiling tile, smooth finish (tan ceiling tile)	ND
USPC-6A-253		ND
USPC-6A-242	2'x2' Suspended ceiling tile with rough texture (white ceiling tile with foil)	ND
USPC-6A-243		ND
USPC-6A-245	12"x12" Acoustical ceiling tile with random dots (tan ceiling tile)	ND
USPC-6A-246		ND
USPC-6A-249*	Drywall/joint compound (3 parts)	ND
USPC-6A-249 (A)	White drywall	ND
USPC-6A-249 (B)	White joint compound	ND

I.D.	SAMPLED MATERIAL	% ASBESTOS
USPC-6A-249 (C)	White tape	ND
USPC-6A-257*	Layered paper pipe insulation (3 parts)	21.0% Chrysotile
USPC-6A-257 (A)	Tan woven wrap	ND
USPC-6A-257 (B)	Tan felt	ND
USPC-6A-257 (C)	Black felt	70.0% Chrysotile
USPC-6A-258	2'x4' Suspended ceiling panels, random fissured (white)	ND
USPC-6A-259		ND
USPC-6A-260	Tar tape P.I. (black tar)	15.0% Chrysotile
USPC-6A-261	Tar tape P.I. (group method)	NA
USPC-6A-262	Tar tape P.I. (group method)	NA
USPC-6A-226*	Hard plaster (3 parts)	ND
USPC-6A-226 (A)	Off-white sand plaster	ND
USPC-6A-226 (B)	White plaster with paint	ND
USPC-6A-226 (C)	White joint compound with paint	ND
USPC-6A-248*	Hard plaster (3 parts)	ND
USPC-6A-248 (A)	Off-white sand plaster	ND
USPC-6A-248 (B)	White plaster with paint	ND
USPC-6A-248 (C)	White joint compound with paint	ND
USPC-6A-265*	Drywall/joint compound (2 parts)	ND
USPC-6A-265 (A)	White joint compound	ND
USPC-6A-265 (B)	White drywall	ND
USPC-6A-266	Preformed block pipe insulation (white fibrous insulation)	30.0% Chrysotile 10.0% Crocidolite
USPC-6A-271		NA
USPC-6A-273		NA
USPC-6A-274*	Layered paper pipe insulation (3 parts)	16.0% Chrysotile
USPC-6A-274 (A)	Tan felt	20.0% Chrysotile
USPC-6A-274 (B)	White woven wrap	ND
USPC-6A-274 (C)	Black felt	ND
USPC-6A-264*	Hard plaster (2 parts)	ND
USPC-6A-264 (A)	Off-white sand plaster	ND
USPC-6A-264 (B)	White plaster with paint	ND
USPC-6A-267*	Hard plaster (2 parts)	ND
USPC-6A-267 (A)	White plaster with paint	ND
USPC-6A-267 (B)	White joint compound with paint	ND

Inc.			
USPC-6A-269 (A)         Off-white sand plaster         ND           USPC-6A-269 (B)         White plaster with paint         ND           USPC-6A-272*         Hard plaster (2 parts)         ND           USPC-6A-272 (A)         Off-white sand plaster         ND           USPC-6A-272 (B)         White plaster with paint/white joint compound with paint         ND           USPC-6A-275*         Hard plaster (2 parts)         ND           USPC-6A-275 (A)         Off-white sand plaster         ND           USPC-6A-275 (B)         White sand plaster         ND           USPC-6A-276 (A)         Tan felt         25.0% Chrysotile           USPC-6A-276 (A)         Tan felt         25.0% Chrysotile           USPC-6A-276 (B)         White woven wrap         ND           USPC-6A-276 (C)         Black felt         ND           USPC-6A-279 (C)         Black felt         ND           USPC-6A-280         Aircell P.I. (white, with paint)         75.0% Chrysotile           USPC-6A-230         Aircell P.I. (white, with paint)         75.0% Chrysotile           USPC-6A-231         Radiator lining (white felt with inseparable tan mastic)         NA           USPC-6A-232         Radiator lining (group method)         NA           USPC-6A-344         Window glazing (redd	I.D.	SAMPLED MATERIAL	% ASBESTOS
USPC-6A-272	USPC-6A-269*	Hard plaster (2 parts)	-
USPC-6A-272*	USPC-6A-269 (A)	Off-white sand plaster	ND
USPC-6A-272 (A)	USPC-6A-269 (B)	White plaster with paint	ND
USPC-6A-275   Hard plaster with paint/white joint compound with paint white joint compound with paint white joint compound with paint	USPC-6A-272*	Hard plaster (2 parts)	ND
Compound with paint	USPC-6A-272 (A)	Off-white sand plaster	ND
USPC-6A-275 (A)	USPC-6A-272 (B)		ND
USPC-6A-275 (B)   White sand plaster	USPC-6A-275*	Hard plaster (2 parts)	ND
USPC-6A-276*	USPC-6A-275 (A)	Off-white sand plaster	ND
USPC-6A-276 (A)	USPC-6A-275 (B)	White sand plaster	ND
USPC-6A-276 (B)   White woven wrap   ND	USPC-6A-276*	LPPI (3 parts)	21.3% Chrysotile
USPC-6A-276 (C)         Black felt         ND           USPC-6A-279         Fitting on FG line (gray fibrous ins.)         ND           USPC-6A-280         ND         ND           USPC-6A-230         Aircell P.I. (white, with paint)         75.0% Chrysotile           USPC-6A-268         NA         NA           USPC-6A-278         NA         NA           USPC-6A-231         Radiator lining (white felt with inseparable tan mastic)         40.0% Chrysotile           USPC-6A-232         Radiator lining (group method)         NA           USPC-6A-233         NA         NA           USPC-6A-247         Transite radiator lining (gray)         35.0% Chrysotile           USPC-6A-434         Window glazing (reddish brown)         ND           USPC-6A-435         Window caulking (brown)         12.0% Chrysotile           USPC-6A-437         NA         NA           USPC-7-281*         9"x9" Floor tile, green (2 parts)         30.2% Chrysotile           USPC-7-281 (A)         Green floor tile         30.0% Chrysotile           USPC-7-292*         9"x9" Floor tile, green (group method)         NA           USPC-7-292*         9"x9" Floor tile, beige (2 parts)         20.3% Chrysotile           USPC-7-292 (A)         Off-white floor tile         20.0%	USPC-6A-276 (A)	Tan felt	25.0% Chrysotile
USPC-6A-279   Fitting on FG line (gray fibrous ins.)   NID		White woven wrap	ND
USPC-6A-280		Black felt	ND
USPC-6A-280		Fitting on FG line (gray fibrous ins.)	ND
USPC-6A-230			ND
USPC-6A-268		Aircell P.I. (white, with paint)	75.0% Chrysotile
USPC-6A-231			NA
USPC-6A-231 Radiator lining (white felt with inseparable tan mastic)  USPC-6A-232 Radiator lining (group method)  USPC-6A-233 NA  USPC-6A-277 Transite radiator lining (gray)  USPC-6A-434 Window glazing (reddish brown)  USPC-6A-435 Window caulking (brown)  USPC-6A-435 Window caulking (brown)  USPC-6A-437 NA  ###################################			NA
USPC-6A-232         Radiator lining (group method)         NA           USPC-6A-233         NA           USPC-6A-233         35.0% Chrysotile           USPC-6A-277         Transite radiator lining (gray)         35.0% Chrysotile           USPC-6A-434         Window glazing (reddish brown)         ND           USPC-6A-436         ND         12.0% Chrysotile           USPC-6A-435         Window caulking (brown)         12.0% Chrysotile           USPC-6A-437         NA         NA           BUILDING #//           USPC-7-281*         9"x9" Floor tile, green (2 parts)         30.2% Chrysotile           USPC-7-281 (A)         Green floor tile         30.0% Chrysotile           USPC-7-281 (B)         Black mastic         40.0% Chrysotile           USPC-7-301         9"x9" Floor tile, green (group method)         NA           USPC-7-292*         9"x9" Floor tile, beige (2 parts)         20.3% Chrysotile           USPC-7-292 (A)         Off-white floor tile         20.0% Chrysotile			40.0% Chrysotile
USPC-6A-277         Transite radiator lining (gray)         35.0% Chrysotile           USPC-6A-434         Window glazing (reddish brown)         ND           USPC-6A-436         ND           USPC-6A-435         Window caulking (brown)         12.0% Chrysotile           USPC-6A-437         NA           BUILDING ##           USPC-7-281*         9"x9" Floor tile, green (2 parts)         30.2% Chrysotile           USPC-7-281 (A)         Green floor tile         30.0% Chrysotile           USPC-7-281 (B)         Black mastic         40.0% Chrysotile           USPC-7-301         9"x9" Floor tile, green (group method)         NA           USPC-7-292*         9"x9" Floor tile, beige (2 parts)         20.3% Chrysotile           USPC-7-292 (A)         Off-white floor tile         20.0% Chrysotile	USPC-6A-232		NA
USPC-6A-277         Transite radiator lining (gray)         35.0% Chrysotile           USPC-6A-434         Window glazing (reddish brown)         ND           USPC-6A-436         ND           USPC-6A-435         Window caulking (brown)         12.0% Chrysotile           USPC-6A-437         NA           Bell DING ###           USPC-7-281*         9"x9" Floor tile, green (2 parts)         30.2% Chrysotile           USPC-7-281 (A)         Green floor tile         30.0% Chrysotile           USPC-7-281 (B)         Black mastic         40.0% Chrysotile           USPC-7-301         9"x9" Floor tile, green (group method)         NA           USPC-7-292*         9"x9" Floor tile, beige (2 parts)         20.3% Chrysotile           USPC-7-292 (A)         Off-white floor tile         20.0% Chrysotile	USPC-6A-233		NA
USPC-6A-434         Window glazing (reddish brown)         ND           USPC-6A-436         ND           USPC-6A-435         Window caulking (brown)         12.0% Chrysotile           USPC-6A-437         NA           Build DING ##           USPC-7-281*         9"x9" Floor tile, green (2 parts)         30.2% Chrysotile           USPC-7-281 (A)         Green floor tile         30.0% Chrysotile           USPC-7-281 (B)         Black mastic         40.0% Chrysotile           USPC-7-301         9"x9" Floor tile, green (group method)         NA           USPC-7-292*         9"x9" Floor tile, beige (2 parts)         20.3% Chrysotile           USPC-7-292 (A)         Off-white floor tile         20.0% Chrysotile		Transite radiator lining (gray)	35.0% Chrysotile
USPC-6A-436         ND           USPC-6A-435         Window caulking (brown)         12.0% Chrysotile           USPC-6A-437         NA           BUILDING ##           USPC-7-281*         9"x9" Floor tile, green (2 parts)         30.2% Chrysotile           USPC-7-281 (A)         Green floor tile         30.0% Chrysotile           USPC-7-281 (B)         Black mastic         40.0% Chrysotile           USPC-7-301         9"x9" Floor tile, green (group method)         NA           USPC-7-292*         9"x9" Floor tile, beige (2 parts)         20.3% Chrysotile           USPC-7-292 (A)         Off-white floor tile         20.0% Chrysotile			
USPC-6A-435         Window caulking (brown)         12.0% Chrysotile           NA           BPHIDING ##           USPC-7-281*         9"x9" Floor tile, green (2 parts)         30.2% Chrysotile           USPC-7-281 (A)         Green floor tile         30.0% Chrysotile           USPC-7-281 (B)         Black mastic         40.0% Chrysotile           USPC-7-301         9"x9" Floor tile, green (group method)         NA           USPC-7-292*         9"x9" Floor tile, beige (2 parts)         20.3% Chrysotile           USPC-7-292 (A)         Off-white floor tile         20.0% Chrysotile			ND
USPC-7-281* 9"x9" Floor tile, green (2 parts) 30.2% Chrysotile USPC-7-281 (A) Green floor tile 30.0% Chrysotile USPC-7-281 (B) Black mastic 40.0% Chrysotile USPC-7-301 9"x9" Floor tile, green (group method) NA USPC-7-292* 9"x9" Floor tile, beige (2 parts) 20.3% Chrysotile USPC-7-292 (A) Off-white floor tile 20.0% Chrysotile		Window caulking (brown)	12.0% Chrysotile
USPC-7-281* 9"x9" Floor tile, green (2 parts) 30.2% Chrysotile  USPC-7-281 (A) Green floor tile 30.0% Chrysotile  USPC-7-281 (B) Black mastic 40.0% Chrysotile  USPC-7-301 9"x9" Floor tile, green (group method) NA  USPC-7-292* 9"x9" Floor tile, beige (2 parts) 20.3% Chrysotile  USPC-7-292 (A) Off-white floor tile 20.0% Chrysotile			
USPC-7-281* 9"x9" Floor tile, green (2 parts) 30.2% Chrysotile  USPC-7-281 (A) Green floor tile 30.0% Chrysotile  USPC-7-281 (B) Black mastic 40.0% Chrysotile  USPC-7-301 9"x9" Floor tile, green (group method) NA  USPC-7-292* 9"x9" Floor tile, beige (2 parts) 20.3% Chrysotile  USPC-7-292 (A) Off-white floor tile 20.0% Chrysotile		\$33011 (1931×C3 <i>U/a</i>	
USPC-7-281 (A) Green floor tile 30.0% Chrysotile  USPC-7-281 (B) Black mastic 40.0% Chrysotile  USPC-7-301 9"x9" Floor tile, green (group method) NA  USPC-7-292* 9"x9" Floor tile, beige (2 parts) 20.3% Chrysotile  USPC-7-292 (A) Off-white floor tile 20.0% Chrysotile	USPC-7-281*	1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1	30.2% Chrysotile
USPC-7-281 (B)  Black mastic  40.0% Chrysotile  USPC-7-301  9"x9" Floor tile, green (group method)  NA  USPC-7-292*  9"x9" Floor tile, beige (2 parts)  20.3% Chrysotile  USPC-7-292 (A)  Off-white floor tile  20.0% Chrysotile			<u> </u>
USPC-7-301 9"x9" Floor tile, green (group method) NA  USPC-7-292* 9"x9" Floor tile, beige (2 parts) 20.3% Chrysotile  USPC-7-292 (A) Off-white floor tile 20.0% Chrysotile			
USPC-7-292* 9"x9" Floor tile, beige (2 parts) 20.3% Chrysotile USPC-7-292 (A) Off-white floor tile 20.0% Chrysotile			
USPC-7-292 (A) Off-white floor tile 20.0% Chrysotile			

I.D.	SAMPLED MATERIAL	% ASBESTOS
USPC-7-293	9"x9" Floor tile, beige (group method)	NA NA
USPC-7-308*	12"x12" Floor tile, white with gold blotches (2 parts)	11.0% Chrysotile
USPC-7-308 (A)	Grayish white marble floor tile	12.0% Chrysotile
USPC-7-308 (B)	Yellow mastic	ND
USPC-7-309*	12"x12" Floor tile, white with gold blotches (2 parts)	11.9% Chrysotile
USPC-7-309 (A)	Grayish white marble floor tile	12.0% Chrysotile
USPC-7-309 (B)	Yellow mastic	ND
USPC-7-311*	Linoleum floor covering, white pebble pattern (2 parts)	32.2% Chrysotile
USPC-7-311 (A)	White pebble linoleum	35.0% Chrysotile
USPC-7-311 (B)	Tan mastic	ND
USPC-7-312*	Linoleum floor covering, white marble pattern (2 parts)	29.8% Chrysotile
USPC-7-312 (A)	White pebble linoleum	35.0% Chrysotile
USPC-7-312 (B)	Tan mastic	ND
USPC-7-335*	9"x9" Floor tile, green with black and white streaks (2 parts)	40.5% Chrysotile
USPC-7-335 (A)	Green floor tile	45.5% Chrysotile
USPC-7-335 (B)	Black mastic	ND
USPC-7-322*	9"x9" Floor tile, green with black and white streaks (2 parts)	36.0% Chrysotile
USPC-7-322 (A)	Green floor tile	ND
USPC-7-322 (B)	Black mastic	ND
USPC-7-318*	12"x12" Floor tile, gold and black speckled (2 parts)	14.6% Chrysotile
USPC-7-318 (A)	Brownish yellow floor tile	15.0% Chrysotile
USPC-7-318 (B)	Yellow mastic with black mastic	ND
USPC-7-319*	12"x12" Floor tile, gold and black speckled (2 parts)	14.7% Chrysotile
USPC-7-319 (A)	Brownish yellow floor tile	15.0% Chrysotile
USPC-7-319 (B)	Yellow mastic with black mastic	ND
USPC-7-351*	9"x9" Floor tile, white with black streaks (2 parts)	9.2% Chrysotile
USPC-7-351 (A)	White/gold sparkle floor tile	10.0% Chrysotile
USPC-7-351 (B)	Black mastic with paint	ND
USPC-7-352*	9"x9" Floor tile, white with black streaks (2 parts)	9.2% Chrysotile

I.D.	SAMPLED MATERIAL	% ASBESTOS				
USPC-7-352 (A)	White/gold sparkle floor tile	10.0% Chrysotile				
USPC-7-352 (B)	Black mastic with paint	ND				
USPC-7-314	12"x12" Acoustical ceiling tile, slot pattern (tan/white)	ND				
USPC-7-339		ND				
USPC-7-321	2'x4' Suspended ceiling panels, random fissures (white/gray)	ND				
USPC-7-324	12"x12" Acoustical ceiling tile, deep fissures (white)	ND				
USPC-7-326		ND				
USPC-7-327	12"x12" Acoustical ceiling panels, lateral fissures (white/gray)	ND				
USPC-7-328		ND				
USPC-7-341	2'x4' Suspended ceiling panels, random fissures (white/gray)	ND				
USPC-7-283	2'x4' Suspended ceiling tile, lateral fissure (white)	ND				
USPC-7-336		ND				
USPC-7-302	12"x12" Acoustical ceiling tile, dot pattern (tan/white)	ND				
USPC-7-303		ND				
USPC-7-285	Layered paper pipe insulation (LPPI) (tan/whie insulation with painted wrap)	5.0% Chrysotile				
USPC-7-295		NA				
USPC-7-305		NA				
USPC-7-286	Preformed block pipe insulation (PFBPI) white insulation with brown painted wrap)	20.0% Chrysotile				
USPC-7-296		NA				
USPC-7-317		NA				
USPC-7-289	Fittings on fiberglass line	ND				
USPC-7-290		ND				
USPC-7-349		ND				
USPC-7-306	Aircell P.I. (group method)	NA				
USPC-7-284		70.0% Chrysotile				
USPC-7-384		NA				
USPC-7-297	Tar wrap pipe insulation. (black)	20.0% Chrysotile				
USPC-7-298		NA NA				
USPC-7-299		NA				

I.D.	SAMPLED MATERIAL	% ASBESTOS
USPC-7-300	Hard plaster (gray sand plaster with paint)	ND
USPC-7-307		ND
USPC-7-315*	Hard plaster (2 parts)	ND
USPC-7-315 (A)	Off-white sand plaster	ND
USPC-7-315 (B)	White plaster with paint	ND
USPC-7-350	Hard plaster (off-white sand plaster)	Tr <1.0% Chrysotile
USPC-7-316	Mastic on ACT (hockey pucks) (brown)	ND
USPC-7-330		ND
USPC-7-332*	Radiator heat shield (2 parts)	ND
USPC-7-332 (A)	Foil/plastic cover	ND
USPC-7-332 (B)	White woven material	ND
USPC-7-333*	Radiator heat shield (2 parts)	ND
USPC-7-333 (A)	Foil/plastic cover	ND
USPC-7-333 (B)	White woven material	ND
USPC-7-334*	Radiator heat shield (2 parts)	ND
USPC-7-334 (A)	Foil/plastic cover	ND
USPC-7-334 (B)	White woven material	ND
USPC-7-287	Hard plaster (off-white sand plaster)	ND
USPC-7-288		Tr (<1.0% Chrysotile
USPC-7-291		ND
USPC-7-338*	Drywall/joint compound	Trace <1%
<del>.</del>		(Confirmed by point count analysis)
USPC-7-338 (A)	White/tan drywall	ND
USPC-7-338 (B)	Tannish white joint compound	8.0% Chrysotile
USPC-7-338 (C)	White tape	ND
USPC-7-338 (D)	White joint compound with paint	2.0% Chrysotile
USPC-7-343	Aircell duct (white, with painted wrap)	65.0% Chrysotile
USPC-7-344*	Drywall/joint compound (3 parts)	ND
USPC-7-344 (A)	White/tan drywall	ND
USPC-7-344 (B)	White joint compound with paint (2 layers)	ND
USPC-7-344 (C)	White tape	ND
USPC-7-346	Aircell duct (group method)	NA
USPC-7-347	Aircell duct (group method)	NA
USPC-7-348*	Insulation (2 parts)	47.5% Chrysotile

I.D.	SAMPLED MATERIAL	% ASBESTOS
USPC-7-348 (A)	White aircell insulation	75.0% Chrysotile
USPC-7-348 (B)	White fibrous insulation with textured paint	20.0% Chrysotile
USPC-7-447	Window caulking (white elastic with metal) (metal not analyzed)	-
USPC-7-451		15.0% Chrysotile
USPC-7-448	Window glazing (rust brown)	ND
USPC-7-450		ND
	BUILDINGE	
USPC-8-59	Aircell pipe insulation (gray)	85.0% Chrysotile
USPC-8-464	Window caulking (brown)	8.0% Chrysotile
USPC-8-466		NA
USPC-8-463	Window glazing (off-white)	Tr <1.0% Chrysotile
USPC-8-465		NA
	BULDECE	
USPC-9-8	Preformed block tank insulation., tank #1 (white)	65.0% Chrysotile
USPC-9-9		NA
USPC-9-10		NA
USPC-9-11	Preformed block tank insulation tank ins., tank #2 (grayish white/white)	55.0% Chrysotile
USPC-9-12		NA
USPC-9-13		NA
USPC-9-14	Preformed block pipe insulation on large steam line (white/gray insulation)	30.0% Chrysotile
USPC-9-15		NA
USPC-9-16		NA
USPC-9-17	Fitting on fiberglass line (white insulation)	ND
USPC-9-18		ND
USPC-9-19	Preformed block pipe insulation on small steam lines (white insulation)	35.0% Chrysotile
USPC-9-20		NA
USPC-9-21		NA
USPC-9-22	Layered paper pipe insulation on water lines (tan insulation)	10.0% Chrysotile
USPC-9-23		NA

I.D.	SAMPLED MATERIAL	% ASBESTOS
USPC-9-24		NA NA
USPC-9-25	Transite panel (gray/white)	40.0% Chrysotile
USPC-9-26	Preformed block insulation on electrical line (grayish white insulation)	85.0% Chrysotile
USPC-9-27		NA
USPC-9-28		NA
USPC-9-29	Preformed block tank insulation, tank #3 (gray)	75% Chrysotile
USPC-9-30	<u> </u>	NA
USPC-9-31		NA
USPC-9-32	Preformed block on boiler outside exhaust (white insulation)	25.0% Chrysotile
USPC-9-33		NA
USPC-9-34		NA
USPC-9-35	Caulk on boiler (between I-beam and boiler (gray ins. with silver paint)	10.0% Chrysotile
USPC-9-36		NA
USPC-9-37		NA
USPC-9-38	Preformed brick on boiler doors (white insulation)	40.0% Chrysotile
USPC-9-39		NA
USPC-9-40		NA
USPC-9-41	Caulk between boiler tubes (tannish gray insulation)	85.0% Chrysotile
USPC-9-42		NA
USPC-9-43		NA
USPC-9-44	Preformed block on boiler exhaust (inside) (grayish white ins.)	45.0% Chrysotile
USPC-9-45		NA
USPC-9-46		NA
USPC-9-47	Boiler door gasket (gray woven)	80.0% Chrysotile
USPC-9-48		NA NA
USPC-9-49		NA NA
USPC-9-50	Preformed block insulation on boiler tanks (white insulation)	35.0% Chrysotile
USPC-9-51		NA
USPC-9-52		NA

I.D.	SAMPLED MATERIAL	% ASBESTOS				
USPC-9-53	Preformed block tank insulation, tank #4 (white)	35.0% Chrysotile				
USPC-9-54		NA				
USPC-9-55		NA				
USPC-9-56	Preformed block tank insulation, tank #5 (gray)	85.0% Chrysotile				
USPC-9-57		NA				
USPC-9-58		NA				
USPC-9-458	Window caulking (yellowish tan)	20.0% Chrysotile				
USPC-9-460		NA				
USPC-9-457	Window glazing (gray)	Tr <1.0% Chrysotile				
USPC-9-459	g managar	ND				
	ik ir dibig iii i					
USPC-10-1	2'x4' Suspended ceiling panel long random fissure (CT-1) (white)	ND				
USPC-10-2		ND				
USPC-10-3	2'x4' Suspended ceiling panel small deep random fissure (CT-2) (white)	ND				
USPC-10-4		ND				
USPC-10-5	2'x4' Suspended ceiling panel smooth finish (CT-3) (white/brown)	ND				
USPC-10-6		ND				
USPC-10-7	Aircell pipe insulation. (gray)	85.0% Chrysotile				
USPC-10-452	Window glazing (off-white)	Tr <1.0% Chrysotile				
USPC-10-454		Tr <1.0% Chrysotile				
USPC-10-453	Window caulking (brown)	30.0% Chrysotile				
USPC-10-455		NA				
	nonanice see					
USPC-13-470	Window caulking (beige)	10.0% Chrysotile				
USPC-13-472		NA				
USPC-13-469	Window glazing (gray)	Tr <1.0% Chrysotile				
USPC-13-471		ND				
	ingradict are					
USPC-15-60*	Aircell pipe insulation (2 parts)	ND				
USPC-15-60 (A)	Tan paper insulation	ND				
USPC-15-60 (B)	Black felt	ND				

I.D.	SAMPLED MATERIAL	% ASBESTOS				
USPC-15-61*	Aircell pipe insulation (3 parts)	7.7% Chrysotile				
USPC-15-61 (A)	White paper insulation	85.0% Chrysotile				
USPC-15-61 (B)	Tan paper insulation	ND				
USPC-15-61 (C)	Black felt	ND				
USPC-15-62*	Aircell pipe insulation (2 parts)	ND				
USPC-15-62 (A)	Tan paper insulation	ND				
USPC-15-62 (B)	Black felt	ND				
USPC-15-63	Rolled-in insulation (gray)	ND				
USPC-15-64		ND				
USPC-15-65		ND				
USPC-15-66	Drywall joint compound (no apparent JC)	ND				
USPC-15-67		ND				
	IBBILADING #48					
USPC-18-475	Window glazing (gray)	Tr <1.0% Chrysotile				
USPC-18-477		Tr <1.0% Chrysotile				
USPC-18-481		Tr <1.0% Chrysotile				
USPC-18-482		ND				
USPC-18-476	Window caulking (tannish white)	10.0% Chrysotile				
USPC-18-478		NA				

<sup>\* -</sup> Composite analysis (multilayered sample)
NA - Not analyzed
ND - None detected

Table 2 ACM Inventory USPC

BUILDING 1					<del></del>				<del></del> 1
FLOOR	ROOM	TSI (in linear feet)		Cemetous Fittings on Fiberglass (per coun		Quantity Window Caulk (in square feet)		Roofing (in square feet)	
		Quantity	Condition	Quantity	Condition	Quantity	Condition	Quantity	Condition
Basement	All					80	G-SD		
Basement	36	525	G-SD						
Basement	40(tunnels)	820	G						
First	All					2000	G-SD		
First	1			5	G				
First	2		G-D	25	G				
First	4	15	D	16 1	G				
First	42			1	G				
Second	All					2000	G-SD		
Second	5	110 20	G	2	G			<u> </u>	
Second	6	20	D			<u></u>			
Third	18	230	G	20	G		<u> </u>	<u> </u>	
Third	19	10							
Third	20	15	G	ļ					
Fourth	25	155	G	65	G-SD	<u> </u>			
Fourth	All					950	G-SD		
Roofing	Assumed_			<u> </u>				43200	G
				ļ		<b>.</b>	<b> </b>	10000	
Total		2025	<u> </u>	134		5030	L	43200	l

BUILDING	2										
FLOOR	ROOM	TSI		Condition Quantity Radiator Heat Sheild		Window Glaze/Caulk		Quantity Resiliant Floor Covering		Roofing	
		Quantity		Condition	Condition	Quantity	Condition	Suantity	Condition	Quantity	Condition
Basement	All	<del>                                     </del>	<del>  `</del>	<del>1                                    </del>		200	D-SD	<del></del>	├──	<del> </del>	<u>-</u>
First	All			1		21608	G-P				
First	41	170	G-D				-				
First	43			1		<del></del>	<del>                                     </del>	<del> </del>			
First	45	50	G-D G			<del>                                     </del>	<del> </del>	<del> </del>	<u> </u>		
First	50	<del></del>	<u> </u>			<del> </del>	<del> </del>	616	G	1	
First	51					+	1	128	G		
First	52			<del>-  </del>		1	1	252	G	<del> </del>	
First	53					1		168		<b></b>	
First	54					1	1	140		<del> </del>	
First	55					1	1	140	G	<del> </del>	
First	56					1	1	140 72	G		
First	62								<u> </u>		
Second	All				-	-		24072	G-SD		
Second	18			70	G	·	<b> </b>		<b></b>		
Second	25	10	G			1					
Second	27	10 10	G			1		2000	G		
Second	28							100	G		
Second	29							100	G		
Second	30							100	G		
Second	31							100	G		
Second	32			100	G			300			
Second	33							300			
Second	34							300			
Second	35							300	G		
Second	36	<u> </u>						300	G	ļ	
Second	38		G		<u> </u>	1	<u> </u>		<u> </u>		
Second	39						<u> </u>		ļ	Ļ	
Second	40	50	G			ļ	<u> </u>				$\vdash$
Third	All	<del></del>	_		ļ	<b>_</b>	<b> </b>	2376	G	<del></del>	$\vdash$
Third	9	35				<del> </del>	<b> </b>		<u> </u>	├	
Third	10		<u>(</u>			+			<u> </u>	<u> </u>	
Third	11	55 70			<del>                                     </del>	+				<u> </u>	$\vdash \vdash \vdash$
Third	12 13	10			<u> </u>	+			<del>                                     </del>		
Third	All	10	9		<u> </u>	+		10468	G	-	1
Fourth Fourth	All 1	130	G	-	<del> </del>	+		10400	٦	<u> </u>	$\vdash$
Fourth	2	105			<del> </del>	+				$\vdash$	$\vdash \vdash \vdash$
Fourth	3	260			<b></b>	+			$\vdash$	<del> </del>	<b> </b>
Fourth	5	10		<del>-  </del>	<del> </del>	+	<del>                                     </del>			<del> </del>	<del> </del>
Fourth	7	30			<del>                                     </del>	<del> </del>	<del> </del>	l. <del></del>	<del> </del>	<del> </del>	
Fourth	8				<del>                                     </del>	+	<del> </del>		<del></del>	$\vdash$	
Roofing	Assumed		<del>-</del>	+		<del>                                     </del>				10800	la l
- tooning	, woulded			1		1	1			1.5555	-
Totals		1255		170	-	21808		42332		10800	
	• • • • • • • • • • • • • • • • • • • •					<u> </u>	•——		•	•	

BUILDING	3									
FLOOR	ROOM	TSI			044 Ouantity Window Caulk		Resiliant Floor Covering		Roofing	
		Quantity		Condition	Quantity	Condition	Quantity	:	Condition  Quantity Roofing	Condition
First	All				1440	D-SD				
First	43	45	G							
First	46	20	G							
First	48						400	G		
First	65	75	G							
First	66	110								
First	67	105								1
First	68	15	G							
Second	All				1632	D-SD				<u> </u>
Second	28						675			
Second	40	10	G							
Second	42	5	G							
Second	63	40	G							
Third	All				1536	D-SD				
Third	15	255								
Third	17	20	G D					<u></u>		
Third	56&57	10	D							ļ
Third	58&59	60	D							ļ
Fourth	All		<u> </u>		1584	D-SD				
Fourth	1	540								
Fourth	2	12	G							<u> </u>
Fourth	3	115	G G					ļ		ļ
Fourth	52	5	G					Ļ		ļ
Fourth	54	20	G							ļ
Roofing	Assumed		<u> </u>	_					16200	G
Takal	<del> </del>	4400	_	_	0400		4075		40000	
Total	<u> </u>	1462			6192		1075		16200	

**BUILDING 4** Resiliant Floor Covering Ocendition Window Caulk Quantity Roofing ISI **ROOM FLOOR** Condition Condition Condition Quantity Quantity All First 10 445 G First 250 D 11 First 1584 D-SD Αll Second Second 7 10 D 9 25 G Second 288 G 14 Second 225 G 10 G Second 15 30 G 16 Second 160 G 17 Second 50 G 18 Second 1752 D-SD Third All 4 295 G Third 6 90 G Third 1608 D-SD Fourth Αll 1290 G 1 Fourth 2 3 Fourth 30 G 240 G Fourth 16200 G Roofing Assumed 1003 16200 2435 6048 Total

					G		
FLOOR	ROOM	ISI			Roofing		
		Quantity		Condition	Quantity		Condition
First	1	50	G				
First	2	175	G				
Roofing	Assumed				16200	G	
Totals		225	<del>                                     </del>		16200		

**BUILDING 6** 208 Quantity Window Caulk Quantity Roofing FLOOR ROOM Condition Condition Quantity Condition First All 125 G 120 G First 1 2 First 125 G First 4 10 G First 135 G 120 G Second 6 7 Second 8 120 G Second Αll 208 G Second 15600 G Roofing Assumed

755

Total

416

15600

BUILDING 6A

	BUILDING	6A														
					Radiator Heat Sheild/Lining				5				<u>ç</u>		<sub> </sub>	
	1				d/Li				Resiliant Floor Covering		İ		Tar Tape Pipe Insulation		Transite Radiator Lining	
					heij				λος				l la		=	
	1				t Si		<b>~</b>		ř				=		ato	
					ea		Quantity Window Caulk	:	<u> </u>				🏯		ad i	
					F T		Ö		ìt F		l _		<u> </u>		~	
					iato		ဂ္ဂ		iliar		Roofing		ਸ਼੍ਰ		Site	
	FLOOR	ROOM	TSI		ad		ž.		Sex		) S		[m		1 2	
	LOOK	INCOM	1			<u> </u>	>					<u> </u>	<del>                                     </del>	<u> </u>		<u> </u>
1			Quantity	Condition	Quantity	Condition	rtity	Condition	Quantity	Condition	Quantity	Condition	Quantity	Condition	Quantity	Condition
			l a	밀	nan	ह	Гаг	믿	uan	ਵ	l a	풀	ਛੋ	[ 꽃	=	둘
		ļ	Ī	ŏ	<u> </u>	Ö	ā	Ö	Θ	ŏ	ğ	<u> </u>	Ō	<u> </u>	ğ	<u> </u>
	First	All	100		40		696	G-SD			<del> </del>	<b></b>	<b> </b>	<b></b>	<b> </b>	<b> </b>
	First First	44	10 15	6	10	G			480							
	First	45	30	G		<del> </del>			400	<u> </u>	<del></del>	<del> </del>	<del> </del> -	<b></b>	<del> </del>	<del> </del>
	First	47		-					800	G		-		<del>                                     </del>	<u> </u>	
	First	48		G					500	<del>-</del>		<del>                                     </del>	20	G	$\vdash$	$\vdash$
	First	49	55	G								$\vdash$	_ <u></u>	<del>-</del> -		
	First	56	15	G												
	First	59	15	G												
	First	65							375	G					20	G
	Second	All	<u> </u>				864	G-SD							ļ <u></u> .	L
	Second	22	<u> </u>		5	G				ļ						
	Second	23	<b> </b>	ļ	5	G				<u> </u>						<u> </u>
-	Second	26 27	<del>                                     </del>						144	G		<u> </u>	<b> </b>	<b> </b>	ļ	<b>_</b>
	Second Second	28							144 144	G	<u> </u>		<b></b>	<u> </u>	<u> </u>	<b> </b>
	Second	29	<del>                                     </del>	-					144	G		<del>                                     </del>	├──	$\vdash$	<del>                                     </del>	<del>                                     </del>
	Second	30						<del></del>	144							
	Second	31	30	G	15	G	î	i	400	G						
	Second	32			45	G			396							
	Second	33							64			l				
•	Second	34			15	G			168	G						
	Second	35	10	G	15	G			224	G						
	Second	36			10	G			168	G		ļ				<u> </u>
	Second	37			20	G			252	G	<u> </u>	ļ	<b></b>			ļ
	Second Second	38 39	25	G	15	G			224 180	G		<u> </u>	<del> </del>		ļ	ļ
	Second	40							168							-
	Second	41							1440							
	Third	All	t				864	G-SD		ř						
	Third	4	90	G						<b> </b>						
	Third	5	85	G						!						
	Third	6		G					240			ļ <u> </u>				
	Third	8							240			L				
	Third	9		G					96	G						
	Third	10			45	G						<u> </u>				
	Third Third	11 12		ט					300	G		<b></b>				
	Third	15		<u>-</u>	-				300	<u> </u>						
	Third	16														
	Third	17				_										
	Third	18														
	Third	19	25	G				1								
	Third	20														
	Fourth	All					864	G ]								
	Fourth	1	740									L				
,	Fourth	2	15	G					_		7656				-	
	Roofing	Assumed	<b> </b>	<b></b>						ļ	7200	٥	<u> </u>			
	Total		1335		200		3288		6935	<b></b>	7200		20		20	
	TOID		1333		200		JZ00		0533	L	1 200		20		20	

**BUILDING 7** Radiator Heat Sheild/Linin Resiliant Floor Covering Tar Tape Pipe Insulation Quantity Aircell Duct Insulation Window Caulk ဋ FLOOR ROOM Ouantity Condition Quantity Condition Condition Condition Quantity Condition Quantity Quantity Basement Ali 3825 G 1125 G Basement Basement 2 10 G 3 140 G Basement 4 120 G Basement 6 120 G Basement Basement 9 10 G 1500 G-SD First 12 First 15 D First 15 80 D 16 5 D First First 29 100 G 10 G First 33 500 G 10 G 34 **First** 36 15 G 200 G First First 37 140 G 100 G First 38 30 G 39 First 40 144 G First 75 G First 41 42 450 G First First 43 180 G 44 120 G First First 45 10 G 80 G 240 G 20 G First 46 10 G 150 G 30 G 47 20 G 180 G First 48 20 G 180 G First First 49 20 G 40 G 324 G 50 240 G First 360 G 51 First First 52 140 G 53 140 G First 54 168 G First First 55 168 G 140 G 56 First 112 G First 57 First 58 168 G 59 275 G First 60 5600 G 150 G First 700 G First 61 560 G First 63 10 G 74 20 G First First 75 20 G 200 G 76 First 900 G-SD All Second Second 26 50 G 45 G 27 Second 28 25 G Second 68 3200 G Second 20 G 69 Second 750 G All Third 35 G Third 20 35 G 2000 D 15 G Third 21 10 D 22 Third Fourth All 750 G 4560 180 5650 17069 35 1610 Total

BUILDING 8										
FLOOR	ROOM	TSI		Window Caulk		Roofing				
		Quantity	Condition	Quantity	Condition	Quantity	Condition			
First	1	500								
First	2	200	D							
First	All			1600	G-SD					
Roofing	Assumed					13500	SD			
Total		700		1600		13500				

BUILDING	9 ROOM	TSI		PFI on Electrical Lines		Tank Insulation		Window Caulk		Preformed Block Insulation on Boiler Exhaus		Preformed Brick on Boilers		Caulk on Boiler		Roofing		Transite	
		Quantity	Condition	Quantity	Condition		Condition	Quantity	Condition	Quantity	Condition	Quantity	Condition	Quantity	Condition		Condition	Quantity	Condition
First		65					J												
First	2	845	G-SD			3361												35	G
First	3		G-SD			4800				720	SD	800	SD	1290	D	ļ			ļ
Basement		600	D-SD	80	G	1210	D-SD				<u> </u>				L	ļ			<u> </u>
	South	<u> </u>					L			2000	G				L	ļ	ļ <u>.</u>		<u> </u>
All	All	<u> </u>					<u> </u>	1518	G-SD	ļ	ļ		L		<u> </u>	40000	<del> </del>		<b>├</b>
Roofing	Assumed	├									<b> </b>				<del> </del>	12000	<u>ت ا</u>		<del> </del>
Total		2285		80		9371	<u> </u>	1518		2720		800		1290		12000	l	35	<del> </del>

FLOOR	ROOM	TSI		Window Caulk		Roofing	
		Quantity	Condition	Quantity	Condition	Quantity	Condition
First	1	25	G				
First	3	40	G				
First	5	10	G				
All	All			1496	G-SD		
Roofing	Asssumed				-	12500	G
Total		75	_	1496		12500	

DOILDING						
FLOOR	ROOM	Quantity Window Caulk		Roofing		
		Quantity	Condition	Quantity		Condition
All	All	192	G-SD			
All	Assumed			375	G	
Total		192		375	<u> </u>	
					$oldsymbol{ol}}}}}}}}}}}}}}}}}}$	
	1				L.,	
				·		, and the second
	I					

FLOOR	ROOM	TSI		Window Caulk	
		Quantity	Condition	Quantity	Condition
First.	1	47	D-SD		
All	All			182	G-SD
Total		47		182	